

Warden Cathy Talmadge
October 25, 2018

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN :
: :
: :
vs. : :
: :
CITY OF PHILADELPHIA, ET AL. : NO: 2:18-cv-01107

- - -
Philadelphia, Pennsylvania
Thursday, October 25, 2018
- - -

ORAL DEPOSITION of WARDEN CATHY TALMADGE,
taken pursuant to notice, held in the offices of
Strehlow Court Reporting, 1515 Market Street, Suite
1045, Pennsylvania 19102 commencing at 9:58 a.m.,
before Angela M. King, RPR, Court Reporter - Notary
Public there being present.

- - -
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Warden Cathy Talmadge
October 25, 2018

	Page 2	Page 4
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	<p>APPEARANCES</p> <p>LAW OFFICES OF TROY WILSON BY: TROY WILSON, Esquire 215 South Broad Street, 2nd Floor Philadelphia, Pennsylvania 19107 Phone: (215) 985-4566 Email: troywilsonesq@att.net Representing the Plaintiff</p> <p>CITY OF PHILADELPHIA LAW DEPARTMENT BY: MARK J. MAGUIRE, Esquire 1515 Arch Street, 14th Floor Philadelphia, Pennsylvania 19102 Phone: (215) 683-5361 Email: mark.maguire@phila.gov Representing the Defendant</p>	<p>----- (It is agreed by and between counsel, that reading, signing, sealing, filing and certification are hereby waived and all objections, except as to form of the questions, are reserved until the time of trial.) ----- WARDEN CATHY M. TALMADGE, having been duly sworn, was examined and testified as follows: ----- EXAMINATION ----- BY MR. WILSON: Q. I want to introduce myself. My name is Troy Wilson. I'm the attorney who represents the plaintiffs in reference to this particular federal civil lawsuit. Few kind of general rules and regulations, and then I will let your attorney chime in as well when I'm done with my little spiel. Generally, want to make sure you speak in a clear voice. Keep your voice up for the stenographer. Please, try not to answer with grunts or moans or uh-huh or uh-uh because no one knows that. She can't write that. No one knows what that means. If you</p>
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	INDEX WITNESS PAGE WARDEN CATHY TALMADGE EXAMINATION BY: MR. WILSON 4 EXHIBITS NUMBER DESCRIPTION PAGE WILSON-1 TALMADGE MEMORANDUM 26	Page 3 Page 5 don't understand a question, just tell me you don't understand the question. If you'd like me to rephrase the question because you don't understand it, please, tell me to do so, and I will attempt to do so. Essentially at a deposition -- and I am going to get into that with you directly in a few moments. At a deposition, you are legally required to answer each and every question to the best of your ability unless you are instructed not to do so by your attorney. Today, right now, are you taking any medication that will preclude you from understanding my questions or providing me with clear and truthful answers? A. No. Q. If you need to take a break, just let us know. But if want to take a break, the way it generally works is you have to answer whatever question is put before you at that moment. Answer that question, and then you can take a break. MR. WILSON: Just trying to think. Anything else you want to add? MR. MAGUIRE: If it comes up, we'll address it. MR. WILSON: Okay. Yeah. Not a problem. Give me one second.

2 (Pages 2 to 5)

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Warden Cathy Talmadge
October 25, 2018

Page 6	Page 8
<p>1 BY MR. WILSON: 2 Q. We have your full name on the record. What's your 3 educational background? 4 A. Bachelor of Science, Administration of Criminal 5 Justice. 6 Q. Where is that? From the Philadelphia area or? 7 A. Number of schools. Indiana University, Temple. 8 And I finished that University of Phoenix online. 9 Q. Okay. Your BA is from the University of Phoenix? 10 A. Yes. 11 Q. That's the other thing. I just remembered 12 something else. Let's try to make sure we don't talk 13 over each other. I will try. 14 What that means is, I have to put my question on 15 the record first; and then, you can answer however you 16 want to. And I will also make sure that when you are 17 speaking, I will try not to interrupt you, okay? 18 Other than the University of Phoenix, the BA from 19 the University of Phoenix, do you have any other 20 advanced degrees? 21 A. No. 22 Q. Did you receive -- after you graduated from the 23 University of Phoenix with your BA from the University 24 of Phoenix, what did you do next?</p>	<p>1 BY MR. WILSON: 2 Q. Yeah. I was going to say. There is a bunch of 3 prisons on State Road. House of Corrections. 4 And what did you do at the House of Correction? 5 A. I was initially a correctional office with the 6 female population. 7 Q. They have female population at the House of 8 Correction and not at Riverside? 9 A. Originally, it was at the House of Correction in 10 1983. 11 Q. Because they had not built Riverside? 12 A. Correct. 13 Q. Okay. You worked in the House of Correction in the 14 female side in 1983. And you worked there how long? 15 A. I really don't know. From the House of Correction 16 then we built the modulars for the females, maybe 1985. 17 And we still had the House of Correction for the 18 females. So in between the two buildings I worked. 19 Q. Was that as a -- also during that time period, that 20 was as a correctional officer? 21 A. Correct. 22 Q. What kind of training did you have as a 23 correctional officer before you worked at, in 1983 at 24 the House of Correction and at the modulars?</p>
<p>1 A. Continued to work, took different courses 2 through -- job-related courses. 3 Q. What kind of job-related courses? 4 A. Things like interpersonal communication skills, 5 managerial skills, training, things of that nature. 6 Q. Okay. When did you begin work in the correctional 7 facility field? 8 A. September 1983. 9 Q. Okay. And when did you graduate from University of 10 Phoenix? 11 A. I believe it was 2011. 12 Q. Okay. So, you started working in the correctional 13 field first before you got your BA? 14 A. Yes. 15 Q. Okay. So, when did you start working -- you said 16 1983? 17 A. Correct. 18 Q. Okay. 19 Where were you working? 20 MR. MAGUIRE: You look great, by the 21 way. 22 (Group laughter.) 23 THE WITNESS: On State Road. I 24 originally started at the House of Correction.</p>	<p>1 A. When you are hired, you go through training through 2 the training academy, a 12-week training course at the 3 training academy. And they teach you rules, 4 regulations, general orders, how to work in that 5 environment, things of that nature, first aid, 6 self-defense classes. 7 Q. Right. 8 A. Numerous things. 9 Q. Did they teach you anything about how to deal with 10 prisoners who may be suicidal in your training as a 11 correctional officer? 12 A. So, let me think back to 1983 in my training. I 13 really can't recall if it was labeled suicide training, 14 suicide prevention. Just taught us about inmate 15 behaviors. And in particular, I really can't say what 16 type of inmate behaviors. But I just remember learning 17 about inmate behaviors. I can't tell you what it is 18 that I really learned in 1983. 19 Q. Okay. After -- you worked in that situation from 20 '83 to about '85, am I correct or incorrect? 21 A. I'm really not sure when I promoted to Sergeant. I 22 really can't tell you. 23 Q. Okay. You're promoted to Sergeant some time later. 24 And what are your duties as Sergeant?</p>

3 (Pages 6 to 9)

Warden Cathy Talmadge
October 25, 2018

Page 10	Page 12
<p>1 A. As the Sergeant, it was my responsibility to 2 oversee correctional -- correctional officers are a 3 direct line staff. Everything -- 4 Q. What does that mean? 5 A. The correctional officers are the first staff that 6 interact with the inmate population. 7 Q. Okay. 8 A. As a correctional Sergeant, it was my 9 responsibility to supervise those officers that are 10 interacting directly with the inmate population. 11 Q. Is that set up what's being done even now on State 12 Road with the prisons on State Road? 13 A. Yes. Correctional officers are the first line. 14 Q. And for the record, was that set up the same as it 15 was in 2016 when Gene Wilson was housed at the House of 16 Correction? 17 A. Define "set up the same way"? I'm confused on what 18 do you mean by that. 19 Q. Well, you just testified you said the Sergeants 20 basically supervise the correctional officers in the 21 day-to-day interactions with the prisoners. 22 Is that the -- did I rephrase it the right way? 23 A. Yes. 24 Q. My point -- excuse me.</p>	<p>1 and CFCF as a Lieutenant? 2 A. I'm not sure the years. 3 Q. Several years? 4 A. Several years. 5 Q. Okay. And what did your job entail as a Lieutenant 6 now as opposed to a Sergeant? 7 A. As the Lieutenant, Lieutenant's position is 8 managerial at that point. We supervise Sergeants who, 9 in turn, are direct supervision for the inmate 10 population. 11 Q. Okay. And what was your next step after that, 12 after becoming a Lieutenant? 13 A. Correctional Captain. 14 Q. Okay. And how long were you a Correctional Captain 15 until you received another promotion? 16 A. I was Captain for about, maybe, seven years. 17 Q. Before we -- okay. As a Lieutenant, did you 18 receive any special training? 19 A. Yes. As Lieutenant, it was more administrative 20 work, more paperwork involved in reference to 21 correctional staff submitting paperwork. It went 22 through the Sergeant and from the Sergeant to the 23 Lieutenant. We dealt with commitments. 24 Q. What kind of commitments?</p>
<p>1 My question was, is that set up, what you just 2 testified to, is that the way it was in 2016, say, at 3 the House of Correction? 4 A. Yes. 5 Q. Okay. All right. And how long are you a Sergeant 6 before you were promoted? 7 A. I think I was promoted to Lieutenant in 1991. I'm 8 not really sure. 9 Q. Okay. 10 A. Because I was out of work for couple years, so I 11 really don't remember when my actual promotion 12 occurred. 13 Q. It occurred, and you became a Lieutenant. Did 14 you -- where were you working as a Lieutenant? 15 Was it focused on one -- strike the question. 16 Was -- when you became a Lieutenant, was your work 17 focused on one particular prison, or doing work with 18 all the prisons up in State Road? 19 A. I know as a Sergeant I worked at the Detention 20 Center, Holmesburg. Got promoted to Lieutenant. I 21 believe I went back to the House of Correction, CFCF. 22 So, I was at House of Correction and CFCF as a 23 Lieutenant. 24 Q. And how long were you at the House of Correction</p>	<p>1 A. Lieutenants deal with inmate misconducts. 2 Officers -- an officer can submit an inmate misconduct. 3 Sergeant verifies the conduct. And then the Lieutenant 4 reviews it and determines what level this misconduct 5 may be. 6 Q. Do you have a formal hearing for that? 7 A. Yes. 8 Q. Or is it just you review paperwork, and then make a 9 determination? 10 A. Well, dealing with an inmate misconduct, the 11 Lieutenant can have an informal hearing if it is a 12 minor charge towards the inmate misconduct. Then that 13 Lieutenant has an informal hearing. 14 Q. Right. 15 A. If not, the Lieutenant still reviews it. And the 16 Lieutenant decides if this inmate misconduct should be 17 produced to the Disciplinary Hearing Officer, DHO, to 18 determine guilt or innocence. 19 Q. Right. What other -- what, if any, other kind of 20 training did you have as a Lieutenant? 21 A. Again, interpersonal communication skills, 22 administrative training, how to submit paperwork, how 23 to complete paperwork, how to deal with staff issues 24 and inmate issues.</p>

4 (Pages 10 to 13)

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Warden Cathy Talmadge
October 25, 2018

Page 14	Page 16
<p>1 Q. Okay. And after Lieutenant, what did you become? 2 A. Correctional Captain. 3 Q. Okay. And did you have any specialized training 4 when you became or prior to becoming Correctional 5 Captain? 6 A. Yes. I had NIC training. 7 Q. What is that? 8 A. National Institute of Corrections. 9 Q. You had to go somewhere to receive that training? 10 A. Yes. 11 Q. Where did you have to go? 12 A. I believe I was in Denver, Colorado. 13 Q. How long did that training last? 14 A. About a week. 15 Q. What did that training entail? 16 A. Can I go back? 17 You said something about you had to go away to 18 training. I didn't have to go away to training. I 19 requested to go away to training. 20 Q. To Denver? 21 A. Yes. It's a training that I felt that I wanted to 22 pick up on. 23 Q. So, you elected to go? 24 A. Yes.</p>	<p>1 Captain. 2 Q. Okay. 3 A. That consisted of assisting the Deputy Warden with 4 administrative hearings, learning the DHO process. And 5 basically, all the inmate needs fall under the 6 Administrative Captains and Deputy Wardens. 7 Q. What's the DHO process? 8 A. Disciplinary Hearing Officer. 9 Q. Okay. 10 A. That's the process when an inmate is charged with 11 an infraction. 12 Q. Right. 13 A. Or violate any of the rules of the institution. 14 That he sits in front of formal hearing board, which is 15 Disciplinary Hearing Officer. And the officer 16 determines from the information given and the facts 17 seen, the guilt or innocence of the inmate that's being 18 charged. 19 Q. Okay. 20 A. And if it goes -- if guilt is noted, then there is 21 a disposition that is put out through the DHO. 22 Q. Okay. Then you moved up again? 23 A. Yes. 24 Q. To?</p>
Page 15	Page 17
<p>1 Q. Okay. 2 A. The training that is offered through PD -- PDP. 3 Q. What is PDP? 4 A. Philadelphia Department of Prisons. 5 Q. Okay. 6 A. Sorry. 7 Q. That's all right. 8 A. Acronyms. That training consisted of, again, 9 managerial training to be supervising the Lieutenants, 10 the Sergeants, line staff. As the Captain is more 11 administrative and is operational and administrative 12 work. 13 I believe I was initially an Operational Captain. 14 So, I just dealt with the basic operations of the 15 institution. And then there was an Administrative 16 Captain that dealt with inmate grievances, hearings, 17 protective custody, things of that nature. 18 Q. So, you didn't deal with that part of it. You 19 dealt with the day-to-day administration? 20 A. No, let me repeat. 21 There is an Administrative Captain and an 22 Operational. So most of my Captain tenure was 23 operational. I did have a little bit of administration 24 responsibilities when I worked with the females as a</p>	<p>1 A. Deputy Warden. 2 Q. Okay. And on -- strike that. 3 In 2016, you were Deputy Warden at the House of 4 Correction; is that correct? 5 A. No, that is not correct. 6 Q. Okay. 7 A. I was Deputy Warden at Alternative Special 8 Detention Central Unit, acronym ASDCU. That is a 9 institution for community, minimum inmates, work 10 release inmates, things of that nature. 11 Q. Can you describe a little bit better? Community -- 12 just describe what that entails. Like, what does that 13 entail in relation to that job and your interaction 14 with the prisoners given that particular job position? 15 A. Okay. The inmates that are housed at ASDCU are 16 classified either community, which are inmates that can 17 go out and work in the community on grounds. Things of 18 that nature. 19 Then we have the work release inmates that go out, 20 go to work every day and come back every evening or 21 whatever their work hours are. 22 And then we have minimum custody inmates that we 23 allow to go to other institutions to clean and things 24 of that nature.</p>

5 (Pages 14 to 17)

Warden Cathy Talmadge
October 25, 2018

<p>Page 18</p> <p>1 Q. Okay. And so essentially, you tell me if I'm right 2 or wrong, you were supervising those three groups of 3 inmates? 4 A. I was supervising the Captain, the Lieutenant, the 5 Sergeant. 6 Q. Who supervise those inmates? 7 A. Correct. 8 Q. Okay. And how long did you have that job? 9 A. I think I was there about three years. 10 Q. Okay. And that was for all of the prisons up on 11 State Road? It wasn't just like -- am I correct? It 12 wasn't -- you were supervising all of the prisoners, I 13 mean, strike that. 14 In your capacity with that particular job, it 15 didn't just relate to the House of Correction. It 16 related to the other prisons that are located up on 17 State Road; is that correct? 18 A. It didn't relate to any prison except for 19 Alternative Special Detention. 20 Q. What is it called? 21 A. ASDCU. 22 Q. Okay. 23 MR. MAGUIRE: Called ASD. 24 MR. WILSON: Right. That's the one I</p>	<p>Page 20</p> <p>1 strike that. 2 Is it safe to say that you were the supervisor 3 of -- excuse me, the Deputy Warden of ASD in 2016, 4 correct? 5 A. Correct. 6 Q. Okay. What kind of specialized, if any, 7 specialized prison training did you receive in 8 reference to suicide attempt procedures -- prison 9 suicide attempt procedures? 10 A. I never received training on -- say again, 11 suicide -- 12 Q. Suicide attempt procedures. 13 A. There was never any specialized training on suicide 14 behaviors. We -- I believe when I worked at RCF, 15 Riverside for the women. 16 Q. Yes. 17 A. We had a special unit -- maybe I need to go back. 18 ASD is not an institution where we have special 19 management housing. So if we have an inmate that is 20 considered to be suicidal through mental health, then 21 we transfer that inmate to an institution that handles 22 special management housing. 23 So when I was at RCF as a Captain, we had a 24 specialized unit there. And at that unit, the staff</p>
<p>Page 19</p> <p>1 think I heard. 2 BY MR. WILSON: 3 Q. You were focused just on ASD? 4 A. Correct. 5 Q. Okay. And that was your responsibility as Deputy 6 Warden at that time? 7 A. Yes. 8 Q. Okay. How long did you have that particular 9 responsibility before you moved onto other 10 responsibilities? 11 A. I was promoted to Warden in April, where we at, 12 2018? 13 Q. Yes. 14 A. April 2018. Until April 2018, I was at ASD. 15 Q. Do you remember when you became -- when you first 16 took that job at ASD, the Deputy Warden at ASD? What 17 year was that? 18 A. I believe either 2014. I think it was, like, 19 December 2014. I believe, 2015. I'm not really sure. 20 Q. Okay. Until approximately April of 2018. Okay. 21 In your capacity as a Deputy -- so you were the -- 22 for the record, you were Deputy Warden at ASD in charge 23 of those particular units. 24 When Gene Wilson in 2016 when Gene Wilson was --</p>	<p>Page 21</p> <p>1 that worked that unit was showing a film about 2 different disorders for the staff that work those 3 units. 4 Q. I'm not interested in the staff right now. I'm 5 interested in you. 6 Did you take a look at that film for example? 7 A. No, I did not. 8 Q. Okay. In reference to Gene Wilson, you are 9 obviously aware that there was a suicide attempt that 10 was unfortunately successful in 2016 relating to one 11 prisoner named Gene Wilson at the House of Correction, 12 correct? 13 A. Correct. 14 Q. Okay. Can you tell me how -- when did you first 15 become aware of this prisoner named Gene Wilson? 16 A. Gene Wilson was housed at ASD. I remember my 17 Lieutenant contacting me. He wanted to place Gene -- 18 Q. Excuse me. Sorry to interrupt you. Can you please 19 put the name of the Lieutenant that you spoke to on the 20 record? 21 A. I'm not sure. I believe it was Lieutenant Thomson. 22 Q. Okay. 23 A. It was a three-to-eleven shift. And he contacted 24 me by phone to tell me that he had an inmate that</p>

6 (Pages 18 to 21)

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Warden Cathy Talmadge
October 25, 2018

<p style="text-align: right;">Page 22</p> <p>1 wanted protective custody because he had been robbed on 2 the street. He owned a barbershop or something, and he 3 had been robbed previously on the street. And believed 4 that the persons or person that robbed him were at ASD. 5 However, he would not identify who the inmates 6 were. 7 Q. You are getting all of this, what you just 8 testified to, was not from you. Was from Lieutenant 9 Thomson? 10 A. Yes, by phone. 11 Q. Right. 12 A. So, I told him that I wasn't comfortable with 13 putting him in protective custody because any inmate 14 can come up and say I want PC. And I might be putting 15 him protective custody. And the people that he's 16 frightened of can go right to protective custody, as 17 well. And I told him, I said I want to place him at Ad 18 Seg. I want to keep him safe. 19 Q. You want to put him where? 20 A. In Administrative Segregation. I'm sorry. 21 Q. Yeah. We got -- okay. Administrative Segregation. 22 A. I didn't want anyone to be able to hurt him. 23 Q. Did you -- were -- strike that. 24 Were you provided with any information, to the best</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Okay. Did Lieutenant Thomson also tell you, if you 2 recall, whether or not he -- whether or not Mr. Wilson 3 had told -- whether or not Mr. Wilson told him about 4 threats that Lieutenant Thomson did not believe were 5 real? 6 A. I do not recall that. 7 Q. Okay. Because there is paperwork -- there is some 8 internal prison paperwork that indicates from other 9 staff members that all the things that I just talked 10 about were noted by other prison staff members. That 11 he had -- he was anxious. He was nauseous, for 12 example. He had threats that did not seem to be real 13 either directly after, before or prior to the 14 conversation that you had with Lieutenant Thomson. 15 Were you aware of any of that? 16 A. No. 17 Q. Okay. So as a result of this conversation with 18 Lieutenant Thomson, what, if anything, did you do next? 19 A. I told him to place him into Administrative Seg, 20 see if he can get cleared. 21 Q. Where is Administrative Segregation located? 22 A. At the House of Correction. 23 Q. Okay. Why would -- why did you make the decision 24 to house him at the House of Correction as opposed to</p>
<p style="text-align: right;">Page 23</p> <p>1 of your recollection, from Lieutenant Thomson about 2 these so-called people? Any information about the 3 so-called people who may or may not want to hurt him? 4 A. He just said that the inmate would not identify who 5 they were, but they were at ASD. 6 Q. Other than that, you had no information whatsoever 7 about these individuals? 8 A. No. I had no idea who they could be. 9 Q. Okay. All right. So as a result of this 10 conversation with -- did Lieutenant Thomson tell you 11 anything else to the best of your recollection? 12 A. I can't remember all that we discussed on the 13 phone. 14 Q. Did Lieutenant Thomson tell you that Mr. Wilson at 15 the time you spoke to Mr. Wilson, was feeling stressed 16 and had anxiety? 17 Do you remember him telling you anything like that? 18 A. He may have. I'm not sure or -- 19 Q. Sorry. I didn't -- I apologize for interrupting 20 you. Is that your answer? 21 A. Yes. 22 Q. Okay. Or that Mr. Wilson had expressed illogical 23 ideas or was afraid for no reason? 24 A. I do not recall that.</p>	<p style="text-align: right;">Page 25</p> <p>1 somewhere else in the prison system? 2 A. Because the House of Correction has special 3 management housing and his custody level. Based on his 4 custody level, he would go to the House of Correction 5 for special management housing once he was clear. 6 Q. What was his custody level if you recall? 7 A. I really don't recall. 8 Q. Okay. And you got to help me a little bit here. 9 I'm not totally understanding. You wanted to send him 10 to the House of Correction because they had a special 11 unit that would -- that you felt would assist 12 Mr. Wilson; is that correct? 13 A. They had special management housing. They had 14 Administrative Segregation housing at the House of 15 Correction for his custody level when -- 16 MR. MAGUIRE: I don't mean to step on -- 17 is -- when you say special management, does that 18 include Protective Custody, Administrative 19 Segregation and Punitive Segregation? 20 THE WITNESS: Yes. Yes. 21 BY MR. WILSON: 22 Q. So, you thought it would benefit, obviously, 23 Mr. Wilson going to the House of Correction -- 24 A. Yeah.</p>

Warden Cathy Talmadge
October 25, 2018

<p style="text-align: right;">Page 26</p> <p>1 Q. -- for what you just stated? 2 Isn't it true that Lieutenant Thomson also told you 3 that Mr. Wilson had stated earlier to someone that he 4 wanted to either harm himself or harm others? 5 A. I'm not really sure. 6 Q. Okay. Give me one second, ma'am. We have 7 procedure to go through. 8 MR. WILSON: She is going to mark this. 9 (At this time, Exhibit Wilson-1 was 10 marked for identification.) 11 MR. WILSON: For the record, the witness 12 is taking a look at what's been previously 13 marked as Wilson-1. And counsel for the 14 plaintiff has shown this document to counsel for 15 the defendants. Who did, in discovery, 16 previously provide this particular document to 17 plaintiff's counsel. 18 THE WITNESS: Okay. 19 BY MR. WILSON: 20 Q. You have had an opportunity to take a look at 21 what's been marked as Wilson-1, correct, ma'am? 22 A. Correct. 23 Q. There is a signature here approximately on the 24 right -- upper, right side of this particular document.</p>	<p style="text-align: right;">Page 28</p> <p>1 MR. MAGUIRE: Thank you. 2 MR. WILSON: Give me one moment, ma'am. 3 I'll be right with you. 4 BY MR. WILSON: 5 Q. After you having read -- is it -- strike that. 6 Today, is it Warden or Deputy Warden now? 7 A. Warden. 8 Q. Okay. I am going to get to that in a second. I 9 want to make sure that I give you your proper respect. 10 So, Warden, after reading Wilson-1, you said it 11 refreshes your recollection. And isn't it true in your 12 statement, you admitted that you were told that 13 Mr. Wilson wanted to either -- he was either going to 14 get hurt or he was going to harm someone else. 15 Does that refresh your recollection? 16 A. That's what my memo says, yes. 17 Q. And based in part on that or in spite of that, 18 depending on what your perspective is, you instructed 19 Lieutenant Thomson to place Mr. Wilson into 20 administrative placement because he would hurt himself 21 or hurt someone else; is that correct? 22 A. That's correct. 23 Q. By the way, that document in Wilson-1 down at -- 24 direct your attention down at the bottom, there are</p>
<p style="text-align: right;">Page 27</p> <p>1 Can you tell me if that's your signature? 2 A. That is my signature. 3 Q. Just generally, can you tell me what this 4 particular Wilson-1 document is on the record? 5 A. This is a memorandum from myself to Lieutenant 6 Murray explaining the conversation that I had with 7 Lieutenant Thomson in reference to Inmate Wilson being 8 placed in Administrative Segregation. 9 Q. That conversation took place on or about March 25, 10 2016; is that correct? 11 A. Correct. 12 Q. You need to take a look at it again? 13 A. No, I'm fine. 14 Q. For the record, did you have an opportunity to read 15 this document? 16 A. Yes. 17 Q. Okay. Does your reading of this document refresh 18 your recollection about some additional facts that we 19 may have previously discussed? 20 A. Somewhat, yes. 21 Q. Okay. According to this -- give me one second, 22 please? 23 MR. MAGUIRE: Do you have copies? 24 MR. WILSON: I have one. Here it is.</p>	<p style="text-align: right;">Page 29</p> <p>1 words that are underlined. 2 Did you underline those words? 3 A. I must have. It's my memo. 4 Q. I don't know. This is part of what a deposition 5 is. 6 A. Yeah. 7 Q. And the words that are underlined, can you read 8 them on the record please that you underlined? 9 A. Would hurt himself or someone else. 10 Q. Uh-huh. And you had made this decision, you said, 11 based on the specs of administrative placement, 12 correct? 13 A. Correct. 14 Q. What were the specs of administrative placement 15 that you relied on in making this particular decision? 16 A. The inmate in the judgment of staff may, for any 17 reason, pose a threat to himself, herself, others or 18 the security of the facility. 19 Q. Is there -- are there particular or specific rules 20 and regulations that you relied on by number, for 21 example, in making this determination of placing 22 Mr. Wilson where you did? 23 Do you understand the question? 24 A. No, I don't.</p>

8 (Pages 26 to 29)

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Warden Cathy Talmadge
October 25, 2018

<p>Page 30</p> <p>1 Q. Okay. Okay. 2 You wrote down that you relied on the words: "The 3 inmate and the judgment of staff may, for any reason, 4 pose a threat to himself, herself, others or the 5 security of the facility." I understand that's what 6 you wrote. It says what it says. I got you. No 7 problem with that. 8 What I am trying to find out is, if you recall, 9 what if any specific -- where did this wording come 10 from? Which particular internal prison rule or 11 regulation did this wording come from to the best of 12 your recollection? 13 A. It's from the policy for Administrative 14 Segregation. The definition of what is -- it's part of 15 the definition for Administrative Segregation 16 Placement. 17 Q. Okay. Do you recall the specific rule number or 18 regulation number? 19 A. No, I don't. 20 Q. Okay. Have you ever done depositions before? 21 A. Yes, I have. 22 Q. When was the last dep -- time that you performed a 23 deposition? 24 A. Maybe about four, five months ago.</p>	<p>Page 32</p> <p>1 And I could have ended up placing the person that he 2 feared the most in protective custody along with him. 3 Therefore, in Administrative Segregation, there is 4 less possibility of someone being able to hurt him in 5 Administrative Seg. Whereas in protective custody, the 6 opportunity would be there. 7 Q. Did that determination that you just talked about 8 or testified about, did you take it into consideration 9 as well what you stated in your report that he -- you 10 now had information that Mr. Wilson wanted to either 11 harm himself or harm others? 12 Was that factored into your determination or into 13 your decision to place this person into, essentially, 14 solitary confinement? 15 A. He wasn't being placed into solitary confinement. 16 Q. I'll rephrase. 17 Did that factor into your decision to place this 18 person into Administrative Placement at the House of 19 Correction? 20 A. The fact that when the Lieutenant told me that 21 Mr. Wilson, I guess, wanted to -- he may hurt 22 himself -- he may hurt someone else or himself, to 23 place him into Administrative Segregation was my 24 decision because I know he would see Mental Health.</p>
<p>Page 31</p> <p>1 Q. Was it in reference to a -- well, strike that. 2 In reference to your experience in doing 3 depositions, had you ever done depositions regarding 4 this kind of a case, a prison suicide kind of case? 5 A. Never prison suicide. 6 Q. Okay. Are your depositions that were done in the 7 past usually about what a prison correctional officer 8 saw and things of that nature? 9 A. Correct. 10 Q. Other than this particular rule that you stated in 11 your memorandum in reference to the attempted suicide 12 and subsequent death of Mr. Wilson, did you rely on any 13 other rules of -- prison rules and regulations in 14 making your determination that, hey, I'm going to put 15 this person in administrative placement at the House of 16 Correction? 17 A. Yes, I did. 18 Q. Which one? 19 A. Because he -- the protective custody that was asked 20 about by the Lieutenant, I didn't feel that I would be 21 able to keep away anyone that was trying to harm him if 22 I placed him in protective custody. 23 As I said before, anyone can come up and say I feel 24 threatened. Inmate AB is threatening me. I want PC.</p>	<p>Page 33</p> <p>1 Mental Health has the last determining factor on 2 whether a person goes into special management housing. 3 They determine if they are fit for the segregation. 4 I recommended it. And once they are interviewed by 5 mental health and medical, then that determination is 6 either agreed upon or not agreed upon. 7 Q. Okay. One second. Because you said he "may have". 8 You understand the word -- you used the word "may." 9 You are an intelligent woman. You said the word 10 may. He may have wanted to harm himself or others. 11 That means that there was only -- I got to put my 12 question on the record. That means there was only the 13 possibility. 14 Did you use the word "may" in your statement in 15 Wilson-1? 16 A. No, I did not. 17 Q. You used the word -- I am going to quote from you. 18 "He" -- meaning Mr. Wilson -- "would hurt himself or 19 someone else." 20 Is that -- are those the words you put in your 21 report? 22 A. Yes. 23 Q. Just for the record. 24 A. Yes.</p>

Warden Cathy Talmadge
October 25, 2018

Page 34	Page 36
<p>1 Q. Right. So in your report, it said he would hurt 2 himself or someone else. Not he "may" hurt himself or 3 someone else, correct? 4 A. Correct. 5 Q. Is it safe to say then, that based on your 6 recollection of this report, based on your conversation 7 with Lieutenant Thomson, you believed at that moment 8 prior -- directly prior to placing Mr. Wilson in 9 Administrative Placement at the House of Corrections, 10 that he would hurt himself or someone else because 11 that's what you were told by Lieutenant Thomson, 12 correct? 13 A. No, that's not correct. What I believed is that 14 when Lieutenant Thomson told me what he told me, I 15 thought about the Administrative Segregation Placement 16 Directive. And because it said that he -- if I believe 17 that someone may for any reason, I base it on that, 18 that he may. Because if he had did say he would, 19 doesn't mean he will. He may. And I based it on that 20 fact. 21 Q. Right. But you -- just for the record, these are 22 the words that you chose to put into your report, 23 correct? 24 A. Correct.</p>	<p>1 interview with Mr. Wilson done prior to him being 2 placed in -- on D Block in Administrative Placement? 3 A. Had to be done, correct. Yes. 4 Q. I'm not asking -- that's a different question. 5 You're saying it had to be done. I understand that. 6 To the best of your independent recollection, was 7 it done? 8 A. I don't get to see -- I didn't get to see that 9 paperwork. 10 Q. Okay. Generally, you can talk to me -- you can't 11 talk to me about that specifically in relation to 12 Mr. Wilson because you don't really know. You are 13 saying under the rules and regulations, that's what was 14 supposed to have been done, correct? 15 A. Correct. 16 Q. Okay. So, how does it work? Just take me through 17 it. 18 So, you make the order, hey, we want to put him in 19 Administrative Placement. Do you then contact the 20 Mental Health Unit? Or do you have someone else, hey, 21 okay, I made me decision. Do you have someone else 22 contact the Mental Health Unit? 23 A. Normally, once the Lieutenant makes the decision, 24 it's normal -- the Lieutenant processes the paperwork.</p>
<p>1 Q. No one told you to put these particular words into 2 the report, correct? 3 A. Correct. 4 Q. Would you agree with me that using a word someone 5 "may" do something and someone "would" do something are 6 two different actions. 7 Isn't that correct? 8 A. Correct. 9 Q. Okay. Now, you testified that you were going to 10 put him in administrative -- you gave your reasons. 11 You put him in administrative protection. And then you 12 said, essentially, Mental Health would get involved and 13 then make a determination as to Mr. Wilson's mental 14 health. 15 Is that what your understanding was? 16 A. Okay. Yeah, I did say put him into Administrative 17 Segregation placement. 18 Q. Right. 19 A. Once anyone is referred for any kind of special 20 housing management placement, they have to be 21 interviewed and approved through Mental Health and 22 Medical before they can be placed into that 23 Segregation. 24 Q. And to the best of your recollection, was that</p>	<p>1 And sends the inmate to Mental Health to be 2 interviewed, sends the inmate to Medical to be 3 interviewed. And at that point, once he's okay'd by 4 Mental Health and Medical to be placed in special 5 management, he's transported to the Special Housing 6 Management Area. 7 Q. You said the Lieutenant makes the decision. Didn't 8 you make the decision for placement and not the 9 Lieutenant? 10 A. I said normally the Lieutenant. 11 Q. Right. 12 A. The Lieutenant called me. 13 Q. Right. 14 A. I told him to place him into Administrative 15 Segregation. At that point, I'm out of it. I don't -- 16 anything else behind me telling him to place him into 17 Administrative Segregation, I don't -- I'm not privy to 18 seeing. I'm not aware of. I don't know who seen him 19 in Mental Health, who seen him in Medical. 20 The Lieutenant takes over that process. 21 Q. Okay. Right. Just so we're clear, I understand 22 what you just said this. 23 In this particular situation as relates to 24 Mr. Wilson, you were the one who took the</p>

10 (Pages 34 to 37)

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Warden Cathy Talmadge
October 25, 2018

Page 38	Page 40
<p>1 responsibility for making the ultimate decision to say 2 I'm going to place Gene Wilson in Administrative 3 Placement, correct? 4 That's what it seems to say in your memo. 5 A. The way you are saying it -- okay, the Lieutenant 6 contacted me. 7 Q. Yes. 8 A. I told the Lieutenant, place him in Administrative 9 Segregation. At that point, the Lieutenant followed 10 the necessary steps and procedures to have him placed 11 into Administrative Segregation. 12 Q. Well, you believe he did because you just testified 13 you're not sure what happened after you made the 14 decision to instruct Lieutenant Thomson to place him 15 into Administrative Placement. 16 Correct or incorrect? 17 A. Well, he would not have been accepted into the 18 Administrative Segregation housing area had the 19 paperwork not been completed according to policy. 20 Q. Okay. According to -- but you have no personal 21 knowledge because you just testified to that. Okay. 22 But according to the general rules and regulations, 23 once that interview is done, I'm assuming -- you tell 24 me if I'm right or wrong as the then Deputy Warden --</p>	<p>1 inmates. 2 Q. I am going to ask you about that in a second. You 3 said there a -- is there a physical structure to put 4 those particular types of prisoners is what I am asking 5 first? 6 A. Repeat the question. 7 Q. Sure. Okay. If prison officials make a 8 determination that someone has mental health -- a 9 prisoner, excuse me, obviously has mental health 10 problem and/or some suicidal problem or ideation, is 11 there a particular unit up on State Road in one of the 12 prisons where those kinds of prisoners are then 13 physically taken to? 14 A. If I may. You said prison administration. Prison 15 administration doesn't decide if a person has mental 16 health issues. That's a decision that is made by the 17 doctors if a person is having mental health issues. If 18 they do determine that a person has mental health 19 issues that are so severe, they require -- we do have a 20 mental health wing at our Philadelphia Prison Health 21 Service Wing. It's dedicated to mental health issues. 22 Q. Where is that wing physically located in reference 23 to, say, the House of Correction or ASD? 24 A. It's in the Detention Center.</p>
<p>Page 39</p> <p>1 that there is paperwork that's generated as a result of 2 this interview with the prisoner? 3 A. Which interview are we referring to? 4 Q. The one Mental Health talks to, for example, a 5 prisoner that you have determined needs to be placed in 6 Administrative Placement. 7 A. Yes. 8 Q. Okay. And if a determination -- okay. 9 Then the decision is ultimately made to place this 10 particular prisoner into Administrative Placement, 11 correct? 12 A. Correct. 13 Q. If a prisoner is determined by someone in the 14 prison to have mental health issue or some suicidal 15 issue or something like that, does ASD or House of 16 Correction have or some other prison on State Road, is 17 there a dedicated Mental Health Unit to deal with 18 prisoners who may have these issues? 19 A. Yes. 20 Q. Where would that unit be located? 21 A. Well, they have a mobile doctor that goes from 22 institution to institution as required. Meanwhile, 23 they have a social -- mental health social worker 24 that's on duty at the institutions to interview the</p>	<p>Page 41</p> <p>1 Q. It's in the DC? 2 A. Yes. 3 Q. I know some acronyms, too. 4 A. Yes. It's in the Detention Center. 5 Q. Okay. Now to the best of your worker, was 6 Mr. Wilson -- excuse me, to the best of your 7 recollection, was Mr. Wilson seen by any sort of mobile 8 doctor? 9 A. To the best of my recollection or to the best of 10 what is supposed to be done? 11 Q. Uh-uh. 12 A. To the best of my recollection, again, yes. He 13 would have been seen, yes. 14 Q. I'm not asking about would have been seen. I'm 15 asking if you have independent recollection that he -- 16 in this particular case, Mr. Wilson was seen by, say, a 17 mobile doctor? 18 A. No. I don't have any recollection. 19 Q. Okay. Other than that conversation with Lieutenant 20 Thomson, did you have a conversation with anyone else 21 in reference to Mr. Gene Wilson? 22 A. No. 23 Q. Okay. And just so I'm clear, why was the decision 24 made to transfer Mr. Wilson to -- from ASD to</p>

Warden Cathy Talmadge
October 25, 2018

<p>1 administrative placement in D Block as opposed to the 2 unit in the DC that you discussed? 3 A. Because special management housing -- 4 MR. MAGUIRE: Hold on. Are you 5 asking about why he was sent to HOC as opposed 6 to the health service wing in DC? 7 MR. WILSON: Yeah. That's basically 8 what I'm saying. Because I'm just saying, he 9 was at ASD. The decision was made to put him in 10 D Block at the House of Correction. But there 11 was another unit at the DC. 12 MR. MAGUIRE: Okay. I'm going to object 13 to the form because it presupposes that she was 14 the one who made that determination. 15 But you may answer. 16 THE WITNESS: Okay. 17 I made the decision to have him placed 18 in Administrative Segregation placement. Which 19 for the inmates housed at ASD, that placement is 20 at the House of Correction. 21 Once the inmate -- that determination 22 was made for him to be placed in Administrative 23 Segregation, he was interviewed by Mental Health 24 who said that he was --</p>	<p>1 ideas. 2 MR. MAGUIRE: I just want to object. 3 MR. WILSON: This is a hypothetical. 4 MR. MAGUIRE: Okay. 5 MR. WILSON: I'll -- 6 MR. MAGUIRE: In this hypothetical, the 7 Lieutenant is communicating all of these things 8 that you are saying now? 9 MR. WILSON: Yeah. 10 MR. MAGUIRE: Okay. 11 BY MR. WILSON: 12 Q. Okay. And that this particular inmate is afraid 13 for no reason and told prison staff of physical threats 14 that were deemed to be unreal. If you had all of that 15 information from a Lieutenant, would you still have 16 made the same determination to place that particular 17 inmate into D Block in Administrative Placement? 18 A. Inmate, no. The inmate would have been referred. 19 Q. When you said -- just for the record, you have to 20 say referred to where? 21 A. An emergency referral would have been generated in 22 the computer. What that is, is it gives you all 23 different synopsis of complaints or inmate behavior. 24 And each one you click determines the level of mental</p>
<p>1 BY MR. WILSON: 2 Q. Well, you believe he should have been interviewed 3 by Mental Health because you don't have -- 4 A. Right. 5 Q. On the record, we have to be clear. You don't have 6 a personal recollection that he was or not, correct? 7 A. I recommended that the inmate be placed in 8 Administrative Segregation. 9 Q. Okay. 10 Just generally based on your training and your 11 experience, which -- yeah, your training and 12 experience, if you have an inmate, you get -- strike 13 that. 14 Based on your training and experience, if you have 15 a Lieutenant calling you and says, hey, I got an 16 inmate. He wants to -- he said he would hurt himself 17 or he would hurt someone else. 18 You follow me so far? 19 A. Correct. 20 Q. He also said that this inmate is showing anxiety. 21 Follow me so far? 22 A. I'm following you. 23 Q. Okay. The inmate is nauseous and is throwing up. 24 The inmate is -- let's see, has expressed illogical</p>	<p>1 healthcare. 2 So in other words, if he say I want to hurt myself, 3 you click off the box. It will come up and go to 4 mental health for the inmate to be seen either 5 emergent, routine, expressed, whatever. 6 The inmate would be seen in Mental Health. 7 Q. Okay. But as a -- the then Deputy Warden, your 8 decision then would not have been to place that 9 particular inmate given what you were told by the 10 Lieutenant that I just listed. You would not place 11 that same person in Administrative Placement, or would 12 you have made the decision, no, I got to send this 13 particular inmate exhibiting these things that my 14 Lieutenant is telling me about, I would put him 15 somewhere else? 16 You understand the question? 17 A. I understand the question. 18 Q. Okay. 19 A. So hypothetically -- 20 Q. Yes. 21 A. -- if I wanted to place that inmate into 22 Administrative Segregation -- 23 Q. No. No. I'm asking what would you have done, 24 hypothetically given those particular factors, if a</p>

12 (Pages 42 to 45)

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Warden Cathy Talmadge
October 25, 2018

<p>Page 46</p> <p>1 Lieutenant had told you those particular factors? 2 MR. MAGUIRE: Object to the form. 3 You can answer. 4 THE WITNESS: The Lieutenant -- 5 hypothetically, the Lieutenant wouldn't call me 6 to tell me about an inmate with these issues. 7 The Lieutenant would have done the emergency 8 referral. That's nothing he would contact me 9 for. It's a procedure for that. 10 If the inmate was displaying behavior or 11 ideologies and different behaviors, the 12 Lieutenant has procedure to follow. That's not 13 a decision for me to make for inmate to go to 14 Mental Health. 15 BY MR. WILSON: 16 Q. You just made a decision on Gene Wilson based on -- 17 let me finish my question. You can answer however you 18 like. 19 You just made a decision based on your memorandum 20 here, Wilson-1, on one particular prisoner, to place 21 that prisoner for some reason you stated here into 22 Administrative Placement at the House of Correction, 23 correct? And that was based in large part on 24 information that you received from Lieutenant Thomson.</p>	<p>Page 48</p> <p>1 have had him sent over to be an evaluation to 2 have an emergency referral put on him prior to 3 that to be sure that he could handle 4 Administrative Segregation. 5 BY MR. WILSON: 6 Q. Give me one second. I'm just going over some of my 7 notes. 8 Now if you have generally, based on your 9 experience -- you need to take a break? You good? 10 A. No, I'm fine. 11 Q. In your experience as Deputy Warden 2016, prisoners 12 who were deemed to want to harm themselves or harm 13 others, they are generally -- I understand they are 14 given a mental health -- you are saying general rules, 15 they are given mental health evaluation. 16 Are they then, depending on the evaluation, placed 17 in a mental health unit of some sort? 18 MR. MAGUIRE: Object to the form. 19 You can answer. 20 THE WITNESS: Once the inmate -- the 21 commitment goes over for the inmate to be placed 22 in special management housing, if Medical or 23 Mental Health determines the inmate is not fit 24 for segregation, he will not be placed into that</p>
<p>Page 47</p> <p>1 Isn't that correct? I'm asking just -- 2 A. No. You're twisting this. And I just want to be 3 clear that you're twisting this. 4 What I told the Lieutenant from the information 5 that he gave me, which is on that memorandum, is my 6 decision to have the inmate placed into Administrative 7 Segregation because I know that that inmate is going to 8 see Mental Health. And he had -- any issues that he's 9 having, he would display them to Mental Health. 10 He has to be evaluated to be placed in any kind of 11 special management housing. 12 Q. My question -- and I will go back to the 13 hypothetical. I'm ask you in that hypothetical that 14 was just laid out to you. If you had that additional 15 information, would you have still made -- would you 16 have still made the decision to recommend placing that 17 particular prisoner into Administrative Placement at 18 the House of Correction, or would you have sent that 19 particular prisoner somewhere else? 20 MR. MAGUIRE: Object to the form. 21 You can answer. 22 THE WITNESS: If I had that type of 23 information, I would still recommend for 24 Administrative Segregation. However, I would</p>	<p>Page 49</p> <p>1 housing. Depending on the severity of it 2 determines whether he is housed in PHSW for 3 mental health or medical reasons. 4 He won't necessarily have to be housed 5 in Mental Health or in the medical area. He 6 just would not be deemed fit for the 7 segregation. 8 BY MR. WILSON: 9 Q. Based on your training and experience, if a 10 prisoner has told other prison officials, hey, I want 11 to harm -- I will harm myself or others, should that -- 12 based on your training and experience, should that 13 particular prisoner be placed in Administrative 14 Placement in a cell by him or herself? 15 MR. MAGUIRE: Object to the form. 16 Again, this -- you can answer if you understand 17 the question. 18 THE WITNESS: If an inmate says he 19 wants -- I want to hurt myself, I am going to 20 hurt myself, then again, the officer will do an 21 emergency referral. That's not something that I 22 would do. 23 BY MR. WILSON: 24 Q. Right. What would you do?</p>

Warden Cathy Talmadge
October 25, 2018

<p>Page 50</p> <p>1 A. It would be done before it got to me. I 2 wouldn't -- if the Lieutenant calls me and says, oh, he 3 wants to hurt himself or he's going to hurt someone 4 else -- 5 Q. Which happened here in the Gene Wilson case, 6 correct? 7 A. Correct. 8 Q. Okay. Go ahead. 9 A. I said, place him in Ag Seg because I -- 10 Q. Hold, hold. Ag what? 11 MR. MAGUIRE: Ad Seg. 12 THE WITNESS: Because through the 13 policy, it's clearly stated: Bring harm to 14 himself or others. And I knew he would see 15 Mental Health at the same time. 16 BY MR. WILSON: 17 Q. Right. I'm asking you if based on your training, 18 it's a different question -- trying to make it a 19 different question. 20 Based on your training and experience, is it -- are 21 you trained to put prisoners who have told other 22 prisoner officials, hey, I'm going to harm myself or 23 others, is it fine under the prison rules and 24 regulation to then put that person in Administrative</p>	<p>Page 52</p> <p>1 Q. You can tell me about ASD? 2 A. I can tell you about ASD then. 3 Q. Tell me about ASD then as far as that question is 4 concerned? 5 A. ASD we have nurses, the same amount of nurses that 6 we have through the week. Only one we don't have is 7 phlebotomist for blood work. Other than that, we are 8 staffed. 9 Q. Who would be able to answer -- those -- these 10 questions about the HOC at the House of Correction? 11 A. House of Correction staffing. I'm -- well, since 12 it's now decommissioned. 13 Q. Right. As of 2016, was there a Deputy Warden of 14 the House of Correction? 15 A. Yes. 16 Q. Who would that have been, if you know? 17 A. Deputy Warden Edward Miranda and Deputy Warden 18 Marvin Porter. 19 Q. Do you know Deputy Warden Miranda? 20 A. Yeah, I know him. 21 Q. Is that the same person as a Major Miranda? 22 A. Deputy Warden and Major are the same. 23 Q. Oh. 24 A. It's a slang.</p>
<p>Page 51</p> <p>1 Segregation? 2 MR. MAGUIRE: Object to the form. 3 You can answer. 4 THE WITNESS: It's okay to request for 5 that inmate. In my training -- 6 MR. WILSON: Right. 7 THE WITNESS: -- it's okay for me to 8 request for that inmate to go into 9 Administrative Segregation. 10 BY MR. WILSON: 11 Q. Okay. 12 Is there a difference between the number of nurses 13 and doctors on weekend shift at the House of Correction 14 in -- now I'm talking about 2016 when you were the 15 Deputy Warden at the House of Correction; is that 16 correct? 17 A. No. 18 Q. You were at ASD? 19 A. Correct. 20 Q. Excuse me. Is there a difference in the number of 21 nurses and doctors who are dealing with prisoners on 22 the weekends as opposed to the weekdays? 23 A. I can't tell you anything about the House of 24 Correction staffing.</p>	<p>Page 53</p> <p>1 Q. I didn't know. 2 A. Okay. 3 Q. Thank you. Because I met him recently. 4 MR. WILSON: Off the record. 5 - - - 6 (At this time, a discussion was held off 7 the record.) 8 - - - 9 BY MR. WILSON: 10 Q. What, to the best of your recollection, are the 11 rules and regulations -- internal rules and regulations 12 supposed to be for inspecting and reviewing prison 13 cells when the prisoners are in there? 14 A. Inspecting? 15 Q. Yeah. Do they have a -- what's the rules and 16 regulations for going and checking the cells on a daily 17 basis? 18 Are there any prison rules and regulations 19 regarding the checking of the cells? 20 MR. MAGUIRE: Object to the form. 21 You can answer. 22 THE WITNESS: Tours are made every half 23 hour in all institutions. 24 MR. WILSON: Okay.</p>

14 (Pages 50 to 53)

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Warden Cathy Talmadge
October 25, 2018

Page 54	Page 56
<p>1 BY MR. WILSON: 2 Q. You just took care of my other question. 3 A. We do sanitation and security checks on each shift. 4 Q. When those sanitations and security checks are 5 done, is there a sign-in sheet or a log of some sort 6 that the correctional officer is supposed to sign or 7 with a date and a time or something like that? 8 A. Yes. 9 Q. Okay. And who houses those -- who has those logs 10 or keeps them? 11 A. They are normally maintained via the Warden's 12 office. If they are ever needed, we do keep them. 13 Q. Are they maintained then, for example, Major 14 Miranda would have the logs for the House of 15 Correction? You would have the logs in 2016 for ASD 16 and so forth and so on? 17 Is that the way it works? 18 A. The paperwork is turned into -- it's sheets. It's 19 not logbooks. But they are turned into the Warden's 20 office. And the Warden's office maintains them, not 21 the Deputy Wardens. 22 Q. Okay. So my question is, is it the Warden of each 23 prison or is there, like, one central place where all f 24 the logbooks from the different prisons on State Road</p>	<p>1 performance of your duties. If I look in the logbook 2 and see you haven't made a tour for two hours, we have 3 a problem. You are supposed to make those tours. 4 Q. What happens in that situation? 5 A. Disciplinary action normally. 6 Q. Ranging from what to what? 7 A. From a counseling, verbal warning. Works it way 8 up. 9 Q. Depending on the amount of times the correctional 10 officer may have been derelict in his -- that 11 particular duty? 12 A. Correct. 13 Q. Okay. Are the correctional officers instructed to 14 make any special notations when they -- when they write 15 into the log? 16 A. Yes. Anything out of the ordinary course of the 17 day is supposed to be noted in your log. Any 18 occurrence. 19 Q. If a correctional officer fails to, for whatever 20 reason, to not -- I know what you mean by -- I am using 21 your definition. I am using my word inspection because 22 it popped into my head. 23 During a tour, if they fail to do a tour on the -- 24 in that 30-minute increment, are they told to put an</p>

Warden Cathy Talmadge
October 25, 2018

Page 58	Page 60
<p>1 investigation, spoken to other prison officials about. 2 A. Maybe three. 3 Q. Okay. What years, if you recall? 4 A. This year -- this year was my most recent. 5 Q. So, three in 2018? 6 A. Three? 7 Q. You said three. 8 A. Not three in 2018. 9 Q. You mean three total? 10 A. Yeah. Maybe about three total, yeah. 11 Q. How many in -- let's start in 2016. Besides Gene 12 Wilson, anyone else that you can recall in 2016 of 13 those three? 14 A. No, not really. 15 Q. Okay. What about 2017? 16 A. No. 17 Q. Would it have to be two in 2018? 18 MR. MAGUIRE: She's saying three since 19 1983. 20 THE WITNESS: Right. 21 BY MR. WILSON: 22 Q. Three since 1983. Thank you for the clarification. 23 I wasn't aware of that. 24 MR. MAGUIRE: Sorry.</p>	<p>1 A. No. Gene Wilson is the only suicide that my name 2 was -- 3 Q. Attached to? 4 A. I had to write a memo for. 5 Q. Because of your conversation with the Lieutenant? 6 A. Just the one, yes. 7 Q. That's writing a memo because you were attached to 8 it. But are you telling me you had no other experience 9 with dealing with suicides at the prison other than 10 Gene Wilson? 11 A. Directly. No, I have not. 12 Q. What about indirectly? 13 A. Yes. 14 Q. In what respect indirectly? 15 A. Well, I think I was working at PICC when a guy had 16 a successful suicide. 17 Q. What year would that have been? 18 A. I don't know. Could be 2010. 19 Q. What were you doing -- 20 A. I think. I'm not sure. 21 Q. What were you doing at PICC in 2010 or so? What 22 was your job description? 23 A. Well, I was a Captain there and I was a Deputy 24 Warden there. I really don't know which --</p>
Page 59	Page 61
<p>1 MR. WILSON: You want to testify? 2 (Laughter.) 3 BY MR. WILSON: 4 Q. I mean, it helps out. Sometimes you need 5 clarification. Three since 1983. 6 And for each one, how did you -- what was your 7 involvement in each one? 8 Strike that. Let me save you a little bit of time. 9 You already testified as to your involvement in 10 reference to the Gene Wilson matter in 2016, correct? 11 A. Correct. 12 Q. Is there anything else that you did in reference to 13 the Gene matter in 2016? 14 A. No. 15 Q. Okay. Let's go on the other two then. 16 A. Well, one was at my institution as Warden. And I 17 actually -- no, I'm sorry. That was not a suicide. 18 Sorry. 19 Q. We're down to two. 20 A. House of Correction, sorry, again. That was not a 21 suicide. One suicide. 22 Q. So, you're telling me the one -- we're down from 23 three to one. And that would have been -- I'm assuming 24 you're talking about Gene Wilson then?</p>	<p>1 Q. In what capacity you were dealing with that? 2 A. Yes. Yes. 3 Q. Okay. Just real quick. Presently today, you said 4 your job title has changed again. 5 You are Warden? 6 A. Yes. 7 Q. Warden of what? 8 A. The Detention Center. 9 Q. Okay. And you've been a Warden for the Detention 10 Center for how long? 11 A. Seven months. 12 Q. Okay. In what -- in reference to that suicide, 13 what, if anything, was your involvement -- how were you 14 involved in that? Just physically being there or 15 seeing the -- 16 A. It wasn't a suicide. Remember I said, no, it 17 wasn't a suicide? He just died. 18 Q. It was a prison death? 19 A. Yes. 20 Q. Okay. So, I want to make sure we are clear here. 21 Other than Gene Wilson, that's -- this is the only 22 suicide -- prison suicide that you have dealt with? 23 A. Directly, yes. 24 Q. And how many have you dealt with indirectly then?</p>

16 (Pages 58 to 61)

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Warden Cathy Talmadge
October 25, 2018

Page 62	Page 64
<p>1 A. I believe one when I was at PICC. 2 Q. Okay. That's the other one. Okay. 3 But you -- I thought you just said that was the one 4 that may not have been a suicide, that may have been a 5 prison death? 6 A. No. We had a death and we had a suicide. 7 Q. Okay. 8 A. A few years ago. 9 Q. Are you aware, according to Major Miranda, there 10 was an additional suicide in 2017 at the House of 11 Correction across from, unfortunately, where 12 Mr. Wilson's cell was located in Cell 555? 13 A. I had no idea. 14 Q. Okay. Are you -- in reference to the Gene Wilson 15 case, are you aware that -- did you know that there 16 were allegedly two prisoners in other cells who heard 17 Mr. Wilson getting ready to kill himself? 18 Were you aware of that? 19 A. No, I was not. 20 Q. Based on your training and experience, when a 21 prison official finds out that a prisoner wants to harm 22 himself and will -- says he will harm himself, he will 23 harm others, he's -- get the correct wording here. 24 Give me one second.</p>	<p>1 And at that point, once the referrals is put into 2 the computer, Mental Health is alerted. And they will 3 call for the inmate to come to Mental Health to be 4 evaluated. 5 Q. With that information, the hypothetical that I just 6 gave you, is that -- that's what that particular prison 7 official is supposed to do, if that -- armed with that 8 information that particular prison official doesn't do 9 that, is that prison official supposed to be 10 disciplined in any way for violating internal prison 11 rules and regulations? 12 MR. MAGUIRE: Object to the form. 13 BY MR. WILSON: 14 Q. Do you understand the question? 15 A. Yeah. I do understand the question. But -- 16 MR. MAGUIRE: I'm just going to object 17 to the form. I want to clarify what the 18 hypothetical is. This is that one -- 19 BY MR. WILSON: 20 Q. Here is the hypothetical. I will put it back on 21 the record again so we're clear. 22 MR. MAGUIRE: I understand. But what my 23 question is about the hypothetical as you 24 presented it, are you saying that the prison</p>

Page 63

1 He's anxious. He's depressed. He's nauseous and
2 has expressed illogical ideas and is afraid for no
3 reason as examples. In that situation, based on your
4 training and experience, what is that particular prison
5 official suppose to do with that information?
6 MR. MAGUIRE: Object to the form.
7 You can answer.
8 THE WITNESS: If an officer receives
9 that information, the officer is supposed to do
10 an emergency referral. Goes into the computer
11 and he puts that information in. And what comes
12 out --
13 BY MR. WILSON:
14 Q. Let me stop you for a second. Emergency referral,
15 this is on your internal prison computer; is that
16 correct?
17 A. Correct.
18 Q. It says emergency referral on it?
19 A. Well, let me go back. They do a mental health
20 referral. Depending on the information that goes into
21 the computer, then the results will come out. Either
22 it would be an urgent referral or an emergency referral
23 or routine referral depending on the information that's
24 put in.

Page 65

1 official gets all of that information at once?
2 Like, at one time he gets all that information?
3 MR. WILSON: Yes.
4 MR. MAGUIRE: Okay.
5 BY MR. WILSON:
6 Q. Do you understand the question?
7 A. I understand the question.
8 Hypothetically, you said that different people
9 added different information. One person added this
10 information, another one added this information and
11 another one added that information. All the
12 information added together is different than this
13 information here and then this officer's information
14 here and then that officer has information there.
15 Each time information is given and it's placed into
16 the computer for mental health access, it will come up
17 determining what kind of referral it is. If all that
18 information that you just stated was given to one
19 person, that information should have been put into the
20 computer for Mental Health, and a referral would have
21 been generated. Mental Health would have called for an
22 interview and evaluation of that inmate.
23 Q. If the prison official did not, however in that
24 hypothetical, put that information in and contact

Warden Cathy Talmadge
October 25, 2018

<p>Page 66</p> <p>1 Mental Health, if that part was not done, what, if 2 anything -- based on your experience and position, 3 what, if anything, is supposed to happen to that 4 particular prison official for not inputting that 5 information and notifying Mental Health? 6 A. They would have to explain why it wasn't put in. 7 Why wasn't a referral generated? They would have to 8 explain that. And then from the explanation, whatever 9 was deemed necessary by the supervisor would happen. 10 I'm not really sure. 11 Q. So is it safe to say that, in reference to the Gene 12 Wilson case, this is really the first and only time 13 that you relied on -- that regulation, the internal 14 prison regulation, where you put in bold -- did you put 15 this in bold, or did someone else put this in bold for 16 you? 17 A. I don't recall to be honest with you. 18 Q. Just for the record, I'm looking at Wilson-1, the 19 last sentence or statement in then Deputy Warden Cathy 20 Talmadge's memorandum to Lieutenant R. Murray. It says 21 in bold: "Inmate, in the judgment of staff, may for 22 any reason pose a threat to himself, herself, others or 23 the security of the facility." 24 MR. MAGUIRE: And the document will</p>	<p>Page 68</p> <p>1 Q. What do they -- what do they do? 2 A. They do all the classification of the inmate 3 population, the movement. Every inmate that is 4 accepted in the Philadelphia Department of Prisons, 5 their paperwork comes through CMR. And they determine, 6 like, if their sentences come from the judge, they 7 calculate sentences or probation, parole detainees. 8 All paperwork pertaining to the inmates intake and 9 release -- 10 Q. Do they have to do -- 11 A. -- are there? 12 Q. I apologize. Were you finished? 13 A. I'm done. 14 Q. Okay. Do they have anything to do with 15 facilitating the placement of prisoners? After you 16 made the decision to place Gene Wilson in 17 Administrative Placement, did CMR get involved in that 18 process? Anywhere in that process? 19 A. Yes. 20 Q. In this particular process as it relates to Gene 21 Wilson, how is CMR involved? 22 A. Once the inmate is medically and Mental Health has 23 cleared them, then the inmate is transferred -- CMR 24 facilitates the transfer from one facility to the</p>
<p>Page 67</p> <p>1 speak for itself. But describing that as a 2 statement, I believe, is somewhat inaccurate. 3 It follows a colon where it says, I based this 4 decision on the specs of the Administrative 5 Placement, colon, and then provides that 6 sentence. 7 But the document will speak for itself. 8 MR. WILSON: It's correct. 9 BY MR. WILSON: 10 Q. My question was -- I think you answered it already. 11 You don't know, you don't have an independent 12 recollection of, yeah, I pressed the bold button. 13 You just don't know, right? 14 A. You asked me three different things. 15 Q. Okay. Let me try it again. 16 Do you have an independent recollection of the 17 statement that's in black and in bold down at the 18 bottom of your statement, whether or not you made 19 that -- those letters bold or did someone else do that? 20 A. This is my memo. I wrote it. 21 Q. Right. 22 A. I am pretty sure I did do that. 23 Q. Okay. What is CMR? 24 A. Classification Movement and Records.</p>	<p>Page 69</p> <p>1 other. 2 Q. What does that mean they facilitate the transfer? 3 Tell me. I don't want to guess. 4 What exactly do you mean? 5 A. Okay. They write up a petition for the inmate to 6 leave one institution and go to the additional 7 institution. We just can't take an inmate and say you 8 are going to the House of Correction. It has to be 9 facilitated through CMR. All paperwork has to be in 10 order for that inmate to go to that institution. 11 Q. Right. 12 A. Because of classification issues, we have to be 13 sure that the inmate can house in certain institutions. 14 Q. Is D Block -- isn't it true that D Block on the 15 House of Correction is considered the punitive block 16 for prisoners? Solitary confinement and the like? 17 A. There is D1 and D2. So, D1 or D2? 18 Q. Where was Mr -- 19 A. I put him over to Administrative Seg at the House 20 of Correction. 21 Q. Is that considered D1 or D2 to the best of your 22 experience? 23 A. When I worked there, it was D1. 24 Q. Okay. What did -- is D1 considered like the block?</p>

Warden Cathy Talmadge
October 25, 2018

Page 70	Page 72
<p>1 A. The Special Management Housing Unit, yes. 2 Q. Is there a colloquial word that prison officials 3 and prisoners use for D Block, called the hole or 4 something like that? 5 A. D1 rear is punitive segregation. And people call 6 that the hole. And that's in the rear of D1. 7 Q. Okay. That's in the rear of D1, but that's still 8 D1? 9 A. Yes. 10 Q. That what is D2? What is that considered? 11 A. General population. 12 Q. Okay. All right. 13 So you -- did you have -- just for the record, did 14 you have -- did you -- was Mr. Wilson placed into the 15 rear of D1? 16 A. I don't know where he was housed. 17 Q. Okay. 18 A. He was transferred to House of Correction. 19 Q. You were the Deputy Warden at the time of ASD. Why 20 did you make the recommendation to transfer him to 21 Administrative Placement at the House of Correction? 22 Should that have not been done by Major Miranda? 23 MR. MAGUIRE: Object to the form. 24 You can answer.</p>	<p>1 Q. Other than that one? 2 A. When you say deaths, there are deaths and then 3 there are suicides. 4 Q. That is correct. That's why I said I was dividing 5 them up. 6 A. Deaths? 7 Q. Yes. 8 A. Is that including suicides or people that died? 9 Q. Includes everything where it resulted in death. 10 A. It's a few. I have had two at my jail. 11 Q. You been at several jails. Where are you talking? 12 A. When I say "my jail", as the Warden. Two. 13 Q. At the DC? 14 A. Yes. 15 Q. In what year? 16 A. 2018. 17 Q. Okay. And now the next question is, 2018, those 18 two, neither one were suicides; is that correct? 19 A. Correct. 20 Q. What about in 2017, the general question. Deaths 21 in 2017 that you're aware of? 22 A. I was at ASD. I think someone died there, too, in 23 2017. 24 Q. And suicides, though, none, correct?</p>
Page 71	Page 73
<p>1 THE WITNESS: No. The inmate was a ASD 2 inmate. I placed him into segregation housing. 3 Administrative Segregation, we do not have that 4 at ASD. All inmates that require special 5 management housing from ASD are transferred to 6 House of Correction for that special management 7 housing. So, Major Miranda would have nothing 8 to do with it until that inmate is actually 9 housed at the House of Correction. 10 BY MR. WILSON: 11 Q. Okay. Were you aware in 20 -- for example, in 12 2016, were you aware that there were approximately 19 13 prison deaths in 2016 according to a newspaper article 14 had done some research of prisoners up on State Road? 15 A. I knew we had a few, yes. 16 Q. To the best of your recollection as of right now, 17 if you know, how many prison deaths -- I will start 18 with that. How many prison deaths have you had up on 19 State Road in 2017? 20 A. I can't tell you. 21 Q. Do you have a number or you just don't know? 22 A. I just don't know. 23 Q. Same with 2018. Just don't know? 24 A. I know one.</p>	<p>1 A. Yeah. Not that I recall. 2 Q. Give me one second please. I'm actually almost 3 done. 4 To the best of your recollection, do you know -- 5 well, you worked at the House of Correction at one 6 point. What kind of emergency medical equipment is 7 housed at the House of Correction in relation to, for 8 example, performing, I don't know, CPR and things like 9 that, if you know? 10 A. You mean with medical or with correctional staff? 11 Q. Start with the correctional staff, and then with 12 medical if you know. 13 A. Well, I know we have AED machine that correctional 14 staff have. 15 Q. Was that there as of 2016 if you know? 16 A. Yes. 17 Q. That's what I'm asking about. Just that year. 18 A. Yes. 19 Q. Okay. Go ahead. 20 A. And then the medical has the AED, oxygen, first aid 21 kits. All officers are equipped with the 22 mouth-to-mouth resuscitation kits. 23 Q. What's a mouth-to-mouth resuscitation kit? 24 A. It's a little plastic tube. That if we have to</p>

Page 74

1 perform CPR on a person, it's the connector from your
2 mouth to the inmate's mouth so you don't have to have
3 direct contact for -- to administer CPR and the
4 breathing techniques.
5 Q. And you're saying all correctional officers have
6 that?
7 A. Yes.
8 Q. Is that somewhere, like, on their uniform? Or is
9 that housed in a particular area?
10 A. It's on their belt.
11 Q. It's on their belt?
12 A. Yes.
13 Q. As of 2016, were there any cameras inside of that
14 prison?
15 A. Which prison?
16 Q. House of Correction.
17 A. Not that I know of, no.
18 Q. So other than the tour, there is no way for
19 correctional officers or supervisors to monitor the
20 prisons electronically or by video, correct --
21 A. Correct.
22 Q. -- in that prison?
23 As of 2016, based on your experience at the House
24 of Correction, were the correctional officers generally

C E R T I F I C A T I O N

I, hereby certify that the proceedings and
evidence noted are contained fully and accurately in
the stenographic notes taken by me in the foregoing
matter, and that this is a correct transcript of the
same.

ANGELA M. KING, RPR,
Court Reporter, Notary Public

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Page 75

1 given training in how to perform CPR?
2 A. All officers go through their training academy and
3 they learn CPR, and they do retraining every so many
4 years for your CPR training.
5 Q. Do they get, like, a certificate, for example, if
6 they complete the retraining?
7 A. Yes.
8 Q. At the House of Correction, if you know based on
9 your experience and recollection as of 2016, did you
10 know Mary Lou Orgasan. A woman named -- a nurse named
11 Mary Lou Orgasan?
12 A. No. I don't know her. I have seen her name, but I
13 don't know her.
14 Q. I don't have any other questions.

15 MR. MAGUIRE: Nothing for me.

16 THE WITNESS: Thank you very much.

17 (At this time, the deposition concluded
18 at 10:26 a.m.)

A	ASSOCIA...	button	comes
a.m 1:15 57:13 75:18	37:14,17 38:2,8,11 38:15,18	53:21 63:7 70:24	76:18 CFCF 11:21 11:22 12:1
AB 31:24	39:6,10	behavior 67:10 assuming	comes 5:21 63:11 68:5
ability 5:8	42:1,18,22	38:23 59:23 attached 60:3	comfortable 22:12
able 22:22 31:21 32:4	43:8 44:17 45:11,22	60:7 attempt 5:4	commencement 1:15
52:9	46:22 47:6	20:8,9,12 anxious 24:11	16:10,18
ABRAN 1:4	47:17,24	63:1 apologize	commitments 48:21
academy 9:2 9:3 75:2	48:4 49:13 50:24 51:9	23:19 68:12 apply 76:14	12:23,24
accepted 38:17 68:4	67:4 68:17 69:19 70:21	approved 35:21 attorney 4:15	communic... 44:7
access 65:16	71:3	approximate 57:4	checks 54:3,4
accurately 76:4	admitted 28:12	4:18 5:9 aware 21:9	chime 4:18
acronym 17:8	advanced 6:20	21:15 24:15 approximat...	chose 34:22
acronyms 15:8 41:3	AED 73:13 73:20	19:20 26:23 71:12	community 17:9,11,16
action 56:5	afraid 23:23	April 19:11 19:14,14,20	2:10
actions 35:6	44:12 63:2	Arch 2:11	complaints 44:23
actual 11:11	Ag 50:9,10	area 6:6 37:6	complete 13:23 75:6
Ad 22:17 50:11	AGENCY 1:20	38:18 49:5 74:9	completed 38:19
add 5:20	ago 30:24 62:8	armed 64:7 article 71:13	computer 44:22 63:10
added 65:9,9 65:10,11,12	agree 35:4 33:6,6	ASCDU 17:15	69:12
additional 27:18 47:14 62:10 69:6	ahead 50:8 73:19	ASD 18:23 19:3,14,16 19:16,22	classified 17:16
address 5:22	aid 9:5 73:20	back 9:12 11:21 14:16	case 31:4,4
administer 74:3	AL 1:6	17:20 20:17	41:16 50:5
administrat... 6:4 15:19 15:23 40:14 40:15	alerted 64:2 62:16	black 67:17 block 36:2	5:12 25:5
administrat... 12:19 13:22 15:11,11,15 15:21 16:4 16:6 22:20 22:21 24:19 24:21 25:14 25:18 27:8 28:20 29:11 29:14 30:13 30:15 31:15 32:3,5,18 32:23 34:9 34:15 35:10 35:11,16 36:2,19	allegedly 40:23 41:24 42:9,19	bachelor 6:4 back 9:12 11:21 14:16	15:10,13,16
allow 17:23	51:18 52:1	background 6:3	15:21,22
Alternative 17:7 18:19	52:2,3,5 54:15 70:19	barbershop 22:2	capacity 18:14 19:21
amount 52:5 56:9	71:1,4,5 72:22	base 34:17 based 25:3	CITY 1:6
and/or 40:10	46:16,19,23	28:17 29:11 34:5,6,19	2:10
76:17	ASDCU 17:8 18:21	43:10,14 46:16,19,23	17:17
Angela 1:16 76:10	asked 31:19 67:14	48:8 49:9 49:12 50:17	clarification 58:22 59:5
answer 4:22	asking 36:4	50:20 62:20 63:3 66:2	clarify 64:17
5:7,16,17 6:15 23:20	40:4 41:14 41:15 42:5	67:3 74:23 75:8	classes 9:6
42:15 46:3	45:23 47:1	box 45:3 break 5:14,15	classification 38:19
46:17 47:21	50:17 73:17	48:18 49:9 50:20 62:20	computer 44:22 63:10
48:19 49:16	assist 25:11	63:3 66:2 67:18	69:12
51:3 52:9	assisting 16:3	bottom 28:24 67:18	concerned 52:4
		box 45:3 break 5:14,15	concluded 75:17
		48:18 49:9 50:20 62:20	conduct 13:3
		63:3 66:2 67:18	57:1
		bring 50:13 broad 2:5	confinement 32:14,15
		basically 10:20 16:5	69:16
		12:1,10 12:16	confused 10:17
		buildings 8:18	connector 74:1
		14:12 14:23	consideration 32:8
		built 8:11,16 8:2	colloquial 70:2
		bunch 8:2 14:12	considered 20:20 69:15
		becoming 14:12	colon 67:3,5 69:21,24
			Colorado 14:12 70:10
			come 17:20 22:14 30:9
			contact 36:19 15:8 16:3
			consisted 15:8 16:3
			certify 76:3 64:3 65:16
			certifying 68:6 65:24 74:3
			contacted

21:23 38:6	31:16 32:19	D 3:1 36:2	decommission...	description	discovery	eleven 57:13	45:13
contacting	39:16 40:23	42:1,10	52:12	3:11 60:22	26:15	eleven-thirty	experience
21:17	42:10,20	44:17 69:14	dedicated	39:17 40:21	discussed	57:14	31:2 43:11
contained	46:22 47:18	69:14 70:3	deemed	68:7	23:12 27:19	Email 2:6,12	43:12,14
76:4	51:13,15,24	D1 69:17,17	44:14	Detention	42:2	emergency	48:9,11
Continued	52:10,11,14	69:21,23,24	48:12 49:6	11:19 17:8	53:6	44:21 46:7	49:9,12
7:1	54:15 59:20	70:5,6,7,8	66:9	18:19 40:24	disorders	48:2 49:21	50:20 57:20
control 76:17	62:11 69:8	70:15	Defendant	41:4 61:8,9	21:2	63:10,14,18	60:8 62:20
conversation	69:15,20	D2 69:17,17	2:13	13:9 29:21	display	63:22 73:6	63:4 66:2
23:10 24:14	70:18,21	69:21 70:10	defendants	31:14 32:7	47:9	emergent	69:22 74:23
24:17 27:6	71:6,9 73:5	daily 53:16	26:15	32:12 33:5	displaying	45:5	75:9
27:9 34:6	73:7 74:16	date 54:7	Define 10:17	35:13 39:8	46:10	ended	66:8
41:19,20	74:24 75:8	day 17:20	57:23	40:8 42:14	disposition	32:1	explain
60:5	correctional	56:17	definite 57:13	42:21 44:16	16:21	62:5	66:6
copies 27:23	7:6,12 8:5	day-to-day	definition	determine	DISTRICT	14:15 17:13	explaining
correct 7:17	8:20,23	10:21 15:19	30:14,15	1:1,2	entails	27:6	27:6
8:12,21	9:11 10:2,2	DC 41:1 42:2	56:21	13:18 33:3	environment	9:5	explanation
9:20 17:4,5	10:5,8,13	42:6,11	degrees 6:20	40:18 68:5	equipment	57:1 66:8	57:1
18:7,11,17	10:20 12:13	72:13	Denver 14:12	determined	73:6	expressed	23:22 43:24
19:4 20:4,5	12:14,21	DE 1:22	14:20	39:5,13	equipped	45:5 63:2	45:5
21:12,13	14:2,4 31:7	deal 9:9 13:1	dep 30:22	determines	73:21		
25:12 26:21	54:6 55:8	13:23 15:18	Department	13:4 16:16	document	Esquire 2:4	F
26:22 27:10	55:11,16	39:17	2:10 15:4	44:24 48:23	26:14,16,24	2:10	f 54:23 76:1
27:11 28:21	56:9,13,19	dealing 13:10	68:4	49:2	27:4,15,17	essentially	facilitate 69:2
28:22 29:12	73:10,11,13	51:21 60:9	depending	determining	28:23 66:24	5:5 18:1	facilitated
29:13 31:9	74:5,19,24	61:1	28:18 48:16	33:1 65:17	67:7	32:13 35:12	69:9
34:3,4,12	Corrections	dealt 12:23	49:1 56:9	DHO 13:17	doing 11:17	facilitates	facilitates
34:13,23,24	8:3 14:8	15:14,16,19	63:20,23	16:4,7,21	31:2 57:7,7	68:24	68:24
35:2,3,7,8	34:9	57:22,23	deposition	died 61:17	60:19,21	evaluated	evaluating
36:3,14,15	counsel 4:2	61:22,24	1:12 5:5,7	72:8,22	duly 4:9	47:10 64:4	68:15
38:3,16	26:13,14,17	death 31:12	29:4 30:23	difference	duties 9:24	evaluation	facility 7:7
39:11,12	counseling	61:18 62:5	75:17	51:12,20	56:1	48:1,15,16	29:18 30:5
43:6,19	56:7	62:6 72:9	depositions	different 7:1	duty 39:24	65:22	66:23 68:24
46:23 47:1	couple 11:10	deaths 71:13	30:20 31:3	21:2 35:6	56:11	evening 17:20	fact 32:20
50:6,7	course 9:2	71:17,18	31:3,6	36:4 44:23	E	evidence 76:4	34:20
51:16,19	56:16 57:20	72:2,2,6,20	depressed	46:11 50:18	E 2:2,2 3:1,10	exact 57:4	factor 32:17
56:12 59:10	courses 7:1,2	December	63:1	50:19 54:24	76:1	exactly 69:4	33:1
59:11 62:23	7:3	19:19	Deputy 16:3	65:8,9,12	earlier 26:3	EXAMINA...	factored
63:16,17	Court 1:1,14	16:6 17:1,3	16:6 17:1,3	67:14	EASTERN	3:6 4:11	32:12
67:8 72:4	1:16,20	decides 13:16	17:7 19:5	direct 10:3	1:2	examined 4:9	factors 45:24
72:18,19,24	76:11	decision	19:16,21,22	12:9 28:24	educational	21:6	46:1
74:20,21	CPR 73:8	24:23 29:10	20:3 28:6	74:3 76:17	6:3	example 21:6	facts 16:16
76:6	74:1,3 75:1	29:15 32:13	38:24 45:7	Directive	Edward	24:12 29:21	27:18
Correction	75:3,4	32:17,24	48:11 51:15	34:16	52:17	39:4 54:13	fail 55:24
7:24 8:4,8,9	Criminal 6:4	36:21,23	52:13,17,17	10:10 24:13	75:1	71:11 73:8	56:23
8:13,15,17	custody 15:17	37:7,8 38:1	52:19,22	34:8 60:11	either 17:16	63:3	failing 55:12
8:24 10:16	17:22 22:1	38:14 39:9	54:21 60:23	61:23	19:18 24:13	55:12	55:12
11:3,21,22	22:13,15,16	40:16 41:23	66:19 70:19	Disciplinary	26:4 28:13	excuse 10:24	fall 16:5
11:24 17:4	25:3,4,6,15	42:9,17	describe	28:13 32:10	20:3 21:18	falls 56:19	52:3
18:15 21:11	25:18 31:19	45:8,12	13:17 16:8	33:6 45:4	40:9 41:6	far 43:18,21	52:3
24:22,24	31:22 32:2	46:13,16,19	17:11,12	63:21	51:20		
25:2,4,10	32:5	47:6,16	describing	disciplined	elected 14:23	Exhibit 26:9	feared 32:2
25:15,23		67:4 68:16	67:1	64:10	electronically	exhibiting	feel 31:20,23
	D				74:20		

felt 14:21 25:11	fully 76:4	48:21 63:10 63:20	35:14,21 36:20,22	11:21,22,24 17:3 18:15	45:19,24 46:5 65:8	65:15,18,19 65:24 66:5	56:21
female 8:6,7 8:14	G	going 5:5 8:2	37:1,4,19	21:11 24:22	I	infraction	Institute 14:8 institution
females 8:16 8:18 15:24	Gene 10:15	25:23 26:8 28:8,13,14	39:4,14,17 39:23 40:8	24:24,24 25:2,4,10	idea 23:8 62:13	16:11 initially 8:5 15:13	15:15 16:13 17:9 20:18 20:21 39:22
field 7:7,13	21:16,17	31:14 33:17	40:9,16,17	25:14,23	ideas 23:23 44:1 63:2	inmate 9:14	39:22 55:2 9:16,17 10:6,10
filings 4:3	38:2 41:21	40:2 42:12	40:21 42:6	34:9 39:15	ideation	12:9 13:1,2	59:16 69:6 69:7,10
film 21:1,6	46:16 50:5	47:7 48:6	42:23 43:3	40:23 42:10	identification	13:10,12,16	institutions
find 30:8	58:11 59:10	49:19 50:3	45:4,6	42:20 46:22	26:10	13:24 15:16	17:23 39:24
finds 62:21	59:13,24	50:22 53:16	46:14 47:8	47:18 51:13	identify 22:5 23:4	16:5,10,17 20:19,21	53:23 69:13 instruct instructed
fine 27:13 48:10 50:23	60:1,10	55:20 57:3	47:9 48:14	51:15,23	ideologies	21:24 22:13	38:14
finish 46:17	61:21 62:14	57:7 64:16	48:15,17,23	52:10,11,14	23:4	23:4 27:7	5:9 28:18
finished 6:8 68:12	66:11 68:16	69:8	49:3,5	54:14 59:20	illogical 23:22 43:24 63:2	29:16 30:3	intake 68:8 intelligent
first 6:15 7:13 9:5 10:5,13 19:15 21:14 40:5 66:12 73:20	68:20	good 48:9	50:15 63:19	62:10 69:8	inaccurate	31:24 37:1 37:2 42:21	33:9
fit 33:3 48:23 49:6	general 4:17	graduate 7:9	64:2,3	69:13,15,19	67:2	43:7,12,16	interact 10:6 interacting
five 30:24	9:4 38:22	graduated	65:16,20,21	70:18,21	include 25:18	43:20,23,24	interaction
Floor 2:5,11	48:13 74:24	6:22	66:1,5	71:6,9 73:5	Includes 72:9	44:12,17,18	interactions
focused 11:15 11:17 19:3	generated	great 7:20	68:22	73:7 74:16	including	44:18,23	interested
follow 43:18 43:21 46:12	49:3	grievances	74:23 75:8	74:23 75:8	72:8	45:4,6,9,13	internal 24:8
followed 38:9	62:17	healthcare	15:16	houses 54:9	incorrect	45:21 46:6	30:10 53:11
following 43:22	give 5:24 26:6	15:1	45:1	56:24 57:2	increment	46:10,13	63:15 64:10
follows 4:9 67:3	27:21 28:2	grounds	17:17	17:15 21:16	independent	47:6,7	10:21
foregoing 76:5,13	28:9 48:6	17:17	62:16	42:19 49:2	housing	48:20,21,23	interested
form 4:5 42:13 46:2 47:20 48:18	62:24 73:2	Group 7:22	13:11,13,17	49:4 70:16	houses 54:9	49:18 51:5	internal 24:8
gives 44:22	given 16:16	groups 18:2	16:8,14,15	71:9 73:7	held 1:13	36:6 41:15	21:4,5
go 9:1 14:9,11 53:20 63:6 64:12,17 70:23	17:14 45:9 45:24 48:14	grunts 4:22	guess 32:21	74:9	help 15:6	51:8 64:3	interrupt
formal 13:6 16:14	17:14 45:9 45:24 48:14	guess 32:21	69:3	15:16 16:4	helps 59:4	65:22 66:21	interrupting
forth 54:16	17:23 20:17	guilt 13:18	70:3	16:1 17:1	hey 31:14	68:23 69:5	interview
four 30:24	22:16 25:4	16:17,20	16:17,20	20:19,22	38:18 42:3	69:7,10,13	interpersonal
FRIENDS 1:21	26:7 45:3	guy 60:15	guy 60:15	25:3,5,13	38:18 42:3	71:1,2,8	7:4 13:21
frightened 22:16	46:13 47:12	H	17:1	25:14 33:2	held 1:13	inmate's 74:2	interrupt
front 16:14	50:8 51:8	H 3:10	17:1	35:20 37:5	help 25:8	inmates 17:9	interrupting
full 1:20 6:2	55:1,18	half 53:22	17:1	38:18 42:3	helps 59:4	23:7	interview
goes 16:20	59:15 63:19	handle 48:3	17:1	47:11 48:22	hey 31:14	17:10,15,16	interviewed
goes 16:20	69:6,10	handles 20:21	17:1	49:1 70:1	hired 9:1	17:19,22	33:4 35:21
goes 16:20	73:19 75:2	happen 66:3	17:1	71:2,5,7	HOC 42:5	18:3,6 22:5	37:2,3
goes 16:20	33:2 39:21	gives 44:22	17:1	72:22	hold 42:4	40:1 42:19	42:23 43:2
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	23:3 28:14	honest 66:17	68:8 71:4	4:14
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	28:20,21	happened	39:2,3,24	investigation
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	29:9 32:4	hold 42:4	65:22	58:1
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	32:21,22	harm 26:4,4	13:18 16:17	involved
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	33:18 34:1	Holmesburg	16:16 22:24	12:20 35:12
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	34:2,10	harm 26:4,4	47:15,23	inspection
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	43:16,17	honest 66:17	63:5,9,11	
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	45:2 49:19	hour 53:23	63:20,23	
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	49:20 50:3	hypothetical	64:5,8 65:1	
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	50:3	hypothetical	65:2,9,10	
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	46:24 47:4	hypothetical	65:10,11,12	
goes 16:20	33:5 35:12	go 9:1 14:9,11	17:1	47:15,23	hypothetical	65:13,13,14	

61:14 68:17	41:3 47:7	28:19 31:20	26:21 28:2	mean 10:4,18	68:22	63:1	44:2 46:2
68:21	52:16,19,20	32:20 34:7	machine	18:13 25:16	met 53:3	necessarily	47:20 48:18
involvement	53:1 56:20	34:11,14	73:13	34:19 56:20	minimum	49:4	49:15 51:2
59:7,9	57:19 60:18	36:23,24	MAGUIRE	57:14,17	17:9,22	necessary	53:20 63:6
61:13	60:24 62:15	37:7,9,10	2:10 5:21	58:9 59:4	minor 13:12	38:10 66:9	64:12,16
issue 39:14	67:11,13	37:12,20	7:20 18:23	69:2,4	minutes 55:9	need 5:14	70:23
39:15	70:16 71:17	38:5,8,9,14	25:16 27:23	73:10	55:19 57:3	20:17 27:12	objections 4:4
issues 13:23	71:21,22,23	41:19 43:15	28:1 42:4	57:4	57:4	48:9 59:4	obviously
13:24 39:18	71:24 73:4	44:7,15	42:12 44:2	meaning	Miranda	needed 54:12	21:9 25:22
40:16,17,19	73:8,9,12	45:10,14	44:4,6,10	means 4:24	52:17,19,21	needs 16:5	40:9
40:21 46:6	73:13,15	46:1,4,5,7	46:2 47:20	6:14 33:11	54:14 62:9	39:5	occurred
47:8 69:12	74:17 75:8	46:12,24	48:18 49:15	33:12 76:16	70:22 71:7	neither 72:18	11:12,13
	75:10,12,13	47:4 50:2	50:11 51:2	medical 33:5	misconduct	never 20:10	occurrence
J	knowledge	60:5 66:20	53:20 58:18	35:22 37:2	13:2,4,10	20:13 31:5	56:18
J 2:10	38:21	Lieutenant's	58:24 63:6	37:4,19	13:12,16	newspaper	October 1:9
jail 72:10,12	knows 4:23	12:7	64:12,16,22	48:22 49:3	misconducts	71:13	offered 15:2
jails 72:11	4:24 57:5	Lieutenants	65:4 66:24	49:5 73:6	NEWTOWN	office 8:5	
job 12:5		13:1 15:9	70:23 75:15	73:10,12,20	1:21	54:12,20,20	55:5
17:13,14		line 10:3,13	maintained	medically	NIC 14:6	officer 8:20	
18:8,14		15:10	54:11,13	68:22	NJ 1:22	8:23 9:11	
19:16 60:22		listed 45:10	maintains	medication	normal 36:24	normally	13:2,17
61:4		little 4:19	54:20 55:6	5:10	36:23 37:10	16:8,15,15	
job-related		15:23 17:11	Major 52:21	members	54:11 56:5	31:7 49:20	
7:2,3		25:8 59:8	52:22 54:13	24:9,10	Notary 1:16	54:6 55:16	
judge 68:6		73:24	62:9 70:22	memo 28:16	76:11	55:19 56:10	
judgment		located 18:16	71:7	29:3 38:4	monitor	55:19 56:10	
29:16 30:3		24:21 39:20	making 29:15	60:4,7	74:19	notations	56:19 63:8
66:21		40:22 62:12	29:21 31:14	67:20	months 30:24	56:14	63:9 65:14
Justice 6:5		log 54:5	38:1	memorand...	61:11	noted 16:20	officer's
		56:15,17	management	3:12 27:5	mouth 74:2,2	65:13	
K		logbook 56:1	20:19,22	31:11 46:19	mouth-to-...	officers 10:2	
keep 4:21		logbooks	25:3,5,13	47:5 66:20	73:22,23	10:5,9,13	
22:18 31:21		54:19,24	25:17 33:2	mental 20:20	moved 16:22	10:20 13:2	
54:12 55:18		logs 54:9,14	35:20 37:5	32:24 33:1	19:9	55:8,11	
keeps 54:10		54:15	37:6 42:3	33:5 35:12	movement	56:13 73:21	
		long 8:14	47:11 48:22	35:13,21	67:24 68:3	66:5	74:5,19,24
kill 62:17		11:5,24	70:1 71:5,6	36:20,22	Murray 27:6	number 3:11	75:2
kind 4:17 7:3		12:14 14:13	managerial	37:1,4,19	66:20	6:7 29:20	offices 1:13
8:22 12:24		18:8 19:8	7:5 12:8	39:4,14,17		30:17,18	2:4
13:19 20:6		61:10	15:9	39:23 40:8	N	51:12,20	official 62:21
31:4,4		Lieutenant	look 7:20	March 27:9	71:21	71:21	63:5 64:7,8
35:19 47:10		21:6 26:12	21:6 26:12	40:9,15,17	name 4:14	64:9 65:1	
55:15 65:17		26:20 27:12	26:8	40:18,20,21	6:2 21:19	9:8	
73:6		55:13 56:1	mark.magu...	42:23 43:3	60:1 75:12	65:23 66:4	
kinds 40:12		57:9	2:12	44:24 45:4	named 21:11	nurse 75:10	
King 1:16		looked 57:12	45:6 46:14	45:6 46:14	21:15 75:10	nurses 51:12	49:10 50:22
76:10		looking 55:22	47:8,9	48:14,15,17	75:10	51:21 52:5	58:1 70:2
kit 73:23		66:18	Market 1:14	48:23 49:3	National 14:8	52:5	oh 50:2 52:23
kits 73:21,22		Lou 75:10,11	Marvin 52:18	49:5 50:15	nature 7:5	55:2	
14:1 18:4		75:11	Mary 75:10	63:19 64:2	NY 1:22	okay 5:23 6:9	
knew 50:14		76:10	matter 59:10	64:3 65:16	9:5 15:17	6:17 7:6,9	
71:15		76:10	59:13 76:6	65:20,21	17:10,18,24	O 76:1	7:12,15,18
know 5:14		ma'am 26:6	66:1,5	66:1,5	31:8 55:21	o'clock 57:9	8:13 9:19
8:15 11:19					57:14	57:14	9:23 10:7
29:4 32:24					24:11 43:23	object 42:12	
36:12 37:18							

11:5,9 12:5	one-thirty	30:10 31:10	1:6,9 2:5,10	46:22 47:17	prior 14:4	problem 5:24	36:18 40:3
12:11,14,17	57:6	35:1 37:23	2:11 6:6	49:14 67:5	24:13 34:8	30:7 40:10	42:9 45:14
14:1,3 15:1	one-twenty	39:10 40:4	15:4 40:20	68:15,17	34:8 36:1	40:10 56:3	48:2 50:21
15:5 16:2,9	57:10	40:11 41:16	68:4	70:21	48:2	procedure	50:24 56:24
16:19,22	online 6:8	44:12,16	phlebotomist	placing 29:21	prison 11:17	26:7 46:9	63:24 64:1
17:2,6,15	operational	45:9,13,24	52:7	32:1 34:8	18:18 20:7	46:12	64:20 65:19
18:1,8,10	15:11,13,22	46:1,20	Phoenix 6:8,9	47:16	20:8 24:8	procedures	65:24 66:6
18:22 19:5	15:23	47:17,19	6:18,19,23	plaintiff 2:7	24:10 25:1	20:8,9,12	66:14,14,15
19:8,20,20	operations	49:13 55:5	6:24 7:10	26:14	30:10 31:4	38:10	69:19
20:6 21:8	15:14	56:11 63:4	phone 2:6,12	plaintiff's	31:5,7,13	proceedings	puts 63:11
21:14,22	opportunity	64:6,8 66:4	21:24 22:10	26:17	39:14,16	76:3	putting 22:13
22:21 23:9	26:20 27:14	68:20 74:9	23:13	plaintiffs 4:15	40:7,14,14	process 16:4	22:14
23:22 24:1	32:6	PC 22:14	PHSW 49:2	plastic 73:24	40:20 44:13	16:7,10	Q
24:7,17,23	opposed 12:6	31:24	physical 40:3	please 4:22	49:10 50:23	37:20 68:18	question 5:1
25:8 26:6	24:24 42:1	PD 15:2	44:13	5:3 21:18	53:12,18	68:18,20	5:2,3,8,16
26:18 27:17	42:5 51:22	PDP 15:2,3	physically	27:22 29:8	54:23 55:5	processes	5:17 6:14
27:21 28:8	ORAL 1:12	penalties 55:8	40:13,22	73:2	57:21,21	36:24	produced
30:1,1,17	order 36:18	55:10,11,15	61:14	point 10:24	58:1 60:9	11:1,15	13:17
30:20 31:6	69:10	Pennsylvania	PICC 60:15	12:8 37:3	61:18,22	29:23 33:12	promoted
33:7 35:9	orders 9:4	1:2,9,15,21	60:21 62:1	37:15 38:9	62:5,21	36:4 40:6	9:21,23
35:16 36:10	ordinary	2:5,11	pick 14:22	64:1 73:6	63:4,15	45:16,17	45:16,17
36:16,21	56:16	people 22:15	place 21:17	policy 30:13	64:6,8,9,10	11:6,7,20	11:11 12:15
37:21 38:5	Orgasan	23:2,3 65:8	22:17 24:19	38:19 50:13	64:24 65:23	19:11	49:17 50:18
38:20,21	75:10,11	70:5 72:8	27:9 28:19	popped 56:22	66:4,14	promotion	50:19 52:3
39:8,8 40:7	originally	perform 74:1	32:13,17,23	population	70:2 71:13	11:11 12:15	54:2,22
41:5,19,23	7:24 8:9	75:1	37:14,16	8:6,7 10:6	71:17,18	proper 28:9	64:14,15,23
42:12,16	oversee 10:2	performance	38:2,8,14	10:10 12:10	74:14,15,22	protection	65:6,7
43:9,23	owned 22:2	56:1	39:9 44:16	57:5 68:3	prisoner	35:11	67:10 72:17
44:4,10,12	oxygen 73:20	performed	45:8,10,21	70:11	21:11,15	protective	72:20
45:7,18	P	30:22	46:20 50:9	Porter 52:18	39:2,5,10	questions 4:5	15:17 22:1
50:8 51:4,7	P 2:2,2	performing	54:23 68:16	pose 29:17	39:13 40:9	5:11 52:10	22:13,15,16
51:11 53:2	PA 1:22	73:8	placed 27:8	30:4 66:22	46:20,21	75:14	25:18 31:19
53:24 54:9	PAGE 3:3,11	period 8:19	31:22 32:15	position 12:7	47:17,19	quick 61:3	31:22 32:2
54:22 55:7	paperwork	57:8	35:22 36:2	17:14 66:2	49:10,13	quote 33:17	32:5
55:22 56:13	12:20,21	person 22:4	37:4 38:10	possibility	50:22 62:21	provide 26:16	R
57:18 58:3	13:8,22,23	31:15 32:1	39:5 42:17	32:4 33:13	prisoners	provided	Ranging 56:6
58:15 59:15	13:8,22,23	32:13,18	42:22 43:7	potentially	9:10 10:21	22:24	RCF 20:14
61:3,9,12	24:7,8 36:9	33:2 40:15	47:6,10	55:16	17:14 18:12	provides 67:5	20:23
61:20 62:2	36:24 38:19	40:17,18	48:16,21,24	preclude 5:11	39:18 40:4	providing	27:17 28:10
62:2,7,14	39:1 54:18	45:11 50:24	49:13 65:15	present 1:17	40:12 48:11	5:12	ready 62:17
65:4 67:15	55:3 57:24	52:21 65:9	70:14 71:2	presented	50:21 51:21	Public 1:17	real 24:5,12
67:23 68:14	68:5,8 69:9	65:19 74:1	placement	64:24	53:13 62:16	76:11	61:3
69:5,24	parole 68:7	personal	28:20 29:11	Presently	68:15 69:16	punitive	really 8:15
70:7,12,17	70:15:18	38:20 43:6	29:14 30:16	61:3	70:3 71:14	28:5 29:7	9:13,15,18
71:11 72:17	28:17 29:4	personally	31:15 32:18	pressed 67:12	70:5	reading 4:3	9:21,22
73:19	30:14 46:23	57:22	34:9,15	presupposes	1:13	27:17 28:10	11:8,11
okay'd 37:3	57:24 66:1	persons 22:4	35:17,20	42:13	put 5:16 6:14	35:10,11,16	19:19 25:7
once 25:5	particular	perspective	36:2,19	pretty 67:22	16:21 21:19	26:5 36:12	
33:4 35:19	4:16 9:15	28:18	37:8 38:3	prevention	22:19 31:14		
36:23 37:3	11:17 17:14	pertaining	38:15 39:6	9:14	33:11,20		
38:23 42:21	18:14 19:8	68:8	39:10 42:1	previously	34:22 35:1		
48:20 64:1	19:23 26:16	petition 69:5	42:18,19	37:17	35:10,11,16		
65:1 68:22	26:24 27:4	Philadelphia	44:17 45:11	privy 37:17	26:7		
	29:15,19			probation			

58:14 60:24 66:10,12 rear 70:5,6,7 70:15 reason 23:23 29:17 30:3 34:17 44:13 46:21 56:20 63:3 66:22 reasons 35:10 49:3 recall 9:13 23:24 24:2 24:6 25:6,7 30:8,17 58:3,12 66:17 73:1 receive 6:22 12:18 14:9 20:7 received 12:15 20:10 46:24 receives 63:8 recollection 23:1,11 27:18 28:11 28:15 30:12 34:6 35:24 36:6 41:7,9 41:12,15,18 43:6 53:10 67:12,16 71:16 73:4 75:9 recommend 47:16,23 recommend... 70:20 recommend... 33:4 43:7 record 6:2,15 10:14 19:22 21:20 26:11 27:4,14 29:8 33:12 33:23 34:21 43:5 44:19 53:4,7 64:21 66:18 Records 67:24	reference 4:16 12:20 20:8 21:8 27:7 31:1,2 31:11 40:22 41:21 59:10 59:12 61:12 62:14 66:11 referral 44:21 46:8 48:2 49:21 63:10 63:14,18,20 63:22,22,23 65:17,20 66:7 referrals 64:1 referred 35:19 44:18 44:20 referring 39:3 refresh 27:17 28:15 refreshes 28:11 regarding 31:3 53:19 regulation 30:11,18 50:24 66:13 66:14 regulations 4:17 9:4 29:20 31:13 36:13 38:22 53:11,11,16 53:18 64:11 relate 18:15 18:18 related 18:16 37:23 15:24 19:10 relating 21:10 relation 17:13 36:11 73:7 release 17:10 17:19 68:9 relied 29:15 29:20 30:2 66:13 rely 31:12	remember 9:16 11:11 19:15 21:16 23:12,17 61:16 remembered 6:11 RENA 1:4 repeat 15:20 40:6 rephrase 5:2 10:22 11:5 13:14,19 15:7 16:12 18:1,24 21:4 22:11 22:16 23:9 26:24,24 28:3 34:1 34:21 35:18 37:11,13,21 38:24 43:4 51:6 52:13 55:7 58:20 67:13,21 69:16 represents 4:15 reproduction 76:15 request 51:4 51:8 requested 14:19 require 40:19 71:4 required 5:7 39:22 research 22:4 76:10 reserved 4:5 60:14 respect 28:9 60:14 related 18:16 37:23 15:24 19:10 relating 21:10 relation 17:13 36:11 73:7 release 17:10 17:19 68:9 relied 29:15 29:20 30:2 66:13 rely 31:12	Reviewed 57:24 reviewing 53:12 reviews 13:4 13:15 right 5:10 9:7 10:22 11:5 13:14,19 15:7 16:12 18:1,24 21:4 22:11 21:23 22:11 22:16 23:9 26:24,24 28:3 34:1 28:3 34:1 34:21 35:18 37:11,13,21 38:24 43:4 51:6 52:13 55:7 58:20 67:13,21 69:16 rules 4:17 9:3 16:13 29:19 31:13,13 36:13 38:22 48:14 50:23 53:11,11,15 53:18 64:11 responsibility 10:1,9 19:5 19:9 38:1 result 23:9 24:17 39:1 resulted 72:9 results 63:21 resuscitation 73:22,23 retraining S 2:2 3:10 safe 20:2 review 13:8 22:18 34:5 66:11	sanitation 54:3 sanitations 54:4 save 59:8 saw 31:8 saying 36:5 36:13 38:5 42:8,8 44:8 48:4,24 49:7 51:1,9 57:13 58:18 64:24 74:5 says 28:16 30:6,6 43:15 49:18 50:2 62:22 63:18 66:20 67:3 schools 6:7 Science 6:4 sealing 4:3 second 5:24 Road 7:23 8:3 10:12 10:12 11:18 18:11,17 39:16 40:11 54:24 71:14 robbed 22:1,3 22:4 76:10 RPR 1:16 61:15 seen 16:17 37:18,19 41:7,13,14 rules 4:17 9:3 16:13 29:19 31:13,13 36:13 38:22 48:14 50:23 53:11,11,15 53:18 64:11 Seg 22:18 24:19 32:5 50:9,11 69:19 segregation 22:20,21 24:21 25:14 25:19,19 27:8 30:14 30:15 32:3 S side 8:14 26:24 sign 54:6	sign-in 54:5 signature 26:23 27:1 27:2 signing 4:3 21:2,4 24:9 sits 16:14 situation 9:19 30:3 44:13 37:23 56:4 66:21 73:10 skills 7:4,5 13:21 slang 52:24 52:11 so-called 23:2 23:3 social 39:23 39:23 solitary 32:14 32:15 69:16 State 7:23 8:3 somewhat 27:20 67:2 sorry 15:6 21:18 22:20 23:19 58:24 59:17,18,20 stated 26:1,3 31:10 32:9 40:11 54:24 71:14,19 sort 41:7 48:17 54:5 South 2:5 speak 4:20 67:1,7 speaking 6:17 special 12:18 17:7 18:19 20:17,18,22 25:2,5,10 25:13,17 33:2 35:19 37:4,5 42:3 47:11 48:22 56:14 70:1 71:4,6 specialized 14:3 20:6,7 20:13,24 specific 29:19 30:9,17 36:11 specifically 36:11 stressed 23:15 strike 11:15 17:2 18:13 steps 38:10 stop 57:7 63:14 street 1:14 2:5,11 22:2 22:3 Strehlow 1:14 1:20 stressed 23:15 strike 11:15 17:2 18:13 steps 38:10 stop 57:7 63:14 street 1:14 2:5,11 22:2 22:3 Strehlow 1:14
--	---	--	--	--	---

structure	26:5 28:9	35:9 38:12	23:15 26:9	68:24 69:2	29:23 30:5	36:18 44:2	weekdays
40:3	38:13 40:7	38:21 59:9	30:22 50:15	70:20	33:8 36:5	45:2 47:2	51:22
subject 55:16	48:3 55:22	testify 59:1	53:6 54:7	transferred	37:21 45:16	48:12 49:10	weekend
55:17	57:11 60:20	Thank 28:1	57:7 59:8	68:23 70:18	45:17 48:13	49:19 59:1	51:13
submit 13:2	61:20 66:10	53:3 58:22	65:2,15	71:5	49:16 64:14	61:20 64:17	weekends
13:22	67:22 69:13	75:16	66:12 70:19		64:15,22	69:3	51:22
submitting	sworn 4:9	thing 6:11	75:17	37:5	65:6,7	wanted 14:21	went 11:21
12:21	synopsis	55:21				21:17 22:1	12:21
subsequent	44:23	things 7:4,5	times 56:9	trial 4:6	5:11 25:9	25:9 26:4	whatsoever
31:12	system 25:1	9:5,8 15:17	title 61:4	Troy 2:4,4	35:15	28:13 32:10	23:6
successful		17:10,17,23	today 5:10	4:14			
21:10 60:16	T	24:9 31:8					
suicidal 9:10	T 3:10 76:1,1	44:7 45:13					
20:20 39:14	take 5:14,15	67:14 73:8					
40:10	5:18 21:6	think 5:19					
suicide 9:13	26:20 27:12	9:12 11:7					
9:14 20:8,9	32:8 36:16	18:9 19:1					
20:11,12,13	48:9 69:7	19:18 60:15					
21:9 31:4,5	taken 1:13	60:20 67:10					
31:11 57:21	40:13 76:5	72:22					
59:17,21,21	takes 37:20	Thomson	50:21 56:24				
60:1,16	talk 6:12	21:21 22:9	total 58:9,10	tube 73:24			
61:12,16,17	36:10,11	23:1,10,14	totally 25:9	turn 12:9			
61:22,22	talked 24:9	24:1,4,14	tour 56:2,23	turned 54:18			
62:4,6,10	32:7	24:18 26:2	56:23 57:1	54:19			
suicides 60:9	talking 51:14	57:9,14,15	twelve 57:14	40:11 42:2			
72:3,8,18	59:24 72:11	57:15 74:18	twelve-thirty	42:11 48:17			
72:24	talks 39:4	toured 57:10	57:15	70:1			
Suite 1:14,21	TALMAD...	46:24	touring 55:19	twice 57:12	28:6,6,7,10	25:12,21,23	
supervise	1:12 3:4,12	thought	55:21 57:11	twisting 47:2	UNITED 1:1	38:24 45:7	26:3,8,11
10:9,20	4:8	25:22 34:15	tour 53:22	47:3	units 19:23	48:11 51:15	26:19 27:7
12:8 18:6	Talmadge's	62:3	56:3	two 8:18 35:6	21:3	52:13,17,17	27:24 28:2
supervising	66:20	threat 29:17	trained 50:21	56:2 57:6	University	52:19,22	28:4,13,19
15:9 18:2,4	taught 9:14	30:4 66:22	training 7:5	58:17 59:15	6:7,8,9,18	54:22 55:6	29:22 31:12
18:12	teach 9:3,9	threatened	8:22 9:1,2,2	59:19 62:16	6:19,23,23	59:16 60:24	32:10,21
supervision	techniques	31:24	9:3,10,12	72:10,12,18	7:9	61:5,7,9	33:18 34:8
12:9 76:18	74:4	threatening	9:13 12:18	type 9:16	unreal 44:14	66:19 70:19	36:1,12
supervisor	tell 5:1,4 9:17	31:24	13:20,22	47:22	upper 26:24	72:12	37:24 38:2
20:2 66:9	9:22 18:1	threats 24:4	14:3,6,9,13	types 40:4	urgent 63:22	Warden's	41:6,7,16
supervisors	21:14,24	24:12 44:13	14:15,18,18		use 33:14	54:11,19,20	41:21,24
74:19	23:10,14	three 18:2,9	14:19,21	70:3	55:4	55:4	42:7 43:1
suppose 63:5	24:1 27:1,3	58:2,5,6,7,8	15:2,8,9	usually 31:7	Wardens	44:3,5,9,11	
supposed	38:23 46:6	58:9,10,13	20:7,10,13		16:6 54:21	46:15,16	
36:14 41:10	51:23 52:1	58:18,22	43:10,11,14	V	warning 56:7	48:5 49:8	
53:12 54:6	52:2,3 69:3	59:5,23	49:9,12	verbal 56:7	wasn't 18:11	49:23 50:5	
56:3,17	71:20	67:14	50:17,20	verifies 13:3	18:12 22:12	50:16 51:6	
63:9 64:7,9	telling 23:17	three-to-ele...	51:5 62:20	video 74:20	32:15 58:23	51:10 53:4	
66:3	37:16 45:14	21:23	63:4 75:1,2	violate 16:13	61:16,17	53:9,24	
sure 4:20	59:22 60:8	throwing	75:4	violating	66:6,7	54:1 58:12	
6:12,16	Temple 6:7	43:23	transcript	64:10	way 5:15 7:21	58:21 59:1	
9:21 11:8	tenure 15:22	Thursday 1:9	76:6,14	visually 55:23	10:17,22	59:3,10,24	
12:2 19:19	testified 4:9	time 4:6 8:19	transfer	uh-uh 4:23	11:2 28:23	60:1,10	
21:21 23:18	10:19 11:2	9:23 19:6	20:21 41:24	41:11	38:5 54:17	61:21 62:14	
	22:8 32:8			ultimate 38:1	56:7 64:10	62:17 63:13	
				ultimately	74:18	64:13,19	
				39:9	wailed 4:4	64:5,21	
					want 4:14,20	65:3,5	
					5:15,20	66:12 67:8	
					6:16 22:14	67:9 68:16	
					22:17,18,19	68:21 70:14	
					22:22 23:3	71:10	
					28:9 31:24	52:6	
						Wilson's	

35:13 62:12	11:14 60:15	8:10,14,23 9:12,18 58:19,22 59:5	504-4622 1:22 54 1:21 555 62:12			
Wilson-1	works 5:15	1985 8:16 1991 11:7	6			
3:12 26:9	54:17 56:7					
26:13,21	wouldn't 46:5					
27:4 28:10	50:2					
28:23 33:15	write 4:24					
46:20 66:18	56:14 60:4					
window 57:16	69:5	2	2:12			
windows	writing 60:7	2:18-cv-011...	7			
55:21	wrong 18:2	1:6				
wing 40:20,21	38:24	20 71:11				
40:22 42:6	wrote 30:2,6	2010 60:18	8			
witness 3:3	67:20	60:21	83 9:20			
7:23 25:20		2011 7:11	85 9:20			
26:11,18	X	2014 19:18				
42:16 46:4	X 3:1,10	19:19	9			
47:22 48:20		2015 19:19	9:58 1:15			
49:18 50:12	Y	2016 10:15	985-4566 2:6			
51:4,7	yeah 5:23 8:2	11:2 17:3				
53:22 58:20	22:21 25:24	19:24 20:3				
63:8 71:1	29:6 35:16	21:10 27:10				
75:16	42:7 43:11	48:11 51:14				
woman 33:9	44:9 52:20	52:13 54:15				
75:10	53:15 55:11	58:11,12				
women 20:15	58:10,10	59:10,13				
word 33:8,8,9	64:15 67:12	71:12,13				
33:14,17	73:1	73:15 74:13				
35:4 56:21	year 19:17	74:23 75:9				
70:2	58:4,4	2017 58:15				
wording 30:9	60:17 72:15	62:10 71:19				
30:11 62:23	73:17	72:20,21,23				
words 29:1,2	years 11:10	2018 1:9				
29:7 30:2	12:2,3,4,16	19:12,14,14				
33:20 34:22	18:9 58:3	19:20 58:5				
35:1 45:2	62:8 75:4	58:8,17				
work 7:1,6		71:23 72:16				
9:4 11:10	Z	72:17				
11:16,17		215 1:22 2:5				
12:20 15:12	0	2:6,12				
17:9,17,19		25 1:9 27:9				
17:20,21	1	26 3:12				
21:2 36:16	10:26 75:18	2nd 2:5				
52:7	1045 1:15					
worked 8:13	116 1:21	3				
8:14,18,23	12-week 9:2	30 55:9,19				
9:19 11:19	14th 2:11	57:3,4				
15:24 20:14	1515 1:14	30-minute				
21:1 69:23	2:11	56:24 57:2				
73:5	18940 1:21	57:8,16				
worker 39:23	19 71:12					
41:5	19102 1:15	4				
working 7:12	2:11	4 3:7				
7:15,19	19107 2:5					
	1983 7:8,16	5				